

SECTION 14

Local Agency Comments and Responses

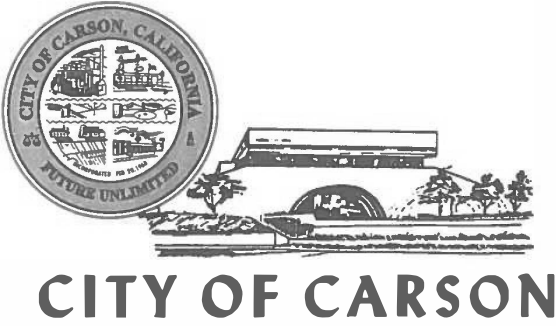
14.1 Local Agency

The following comment letters were received from local agencies on the West Basin Municipal Water District (West Basin) Ocean Water Desalination Project (Project) Draft Environmental Impact Report (Draft EIR). The comment letters are grouped together and are followed by all responses as indicated in **Table 14-1**.

TABLE 14-1
LIST OF DRAFT EIR COMMENT LETTERS: LOCAL AGENCY

Letter Code	Commenting Party	Letter Page Number	Response Page Number
CARS	City of Carson	14-3	14-237
CULV	City of Culver City	14-8	14-239
ELSEG	City of El Segundo	14-12	14-242
HAW	City of Hawthorne	14-15	14-244
HBCH	City of Hermosa Beach	14-16	14-245
MLBU	City of Malibu	14-31	14-261
MBCH	City of Manhattan Beach	14-50	14-277
MBCH2	City of Manhattan Beach 2	14-53	14-278
MBCH3	City of Manhattan Beach 3	14-54	14-279
RBCH	City of Redondo Beach	14-78	14-328
LADPR	Los Angeles County Department of Parks and Recreation	14-82	14-331
LADWP	Los Angeles Department of Water and Power	14-181	14-334
LASAN	Los Angeles Bureau of Sanitation	14-182	14-335
MWD	Metropolitan Water District	14-183	14-336
SCAQ	South Coast Air Quality Management District	14-208	14-337
SCG	SoCal Gas	14-210	14-338
SCG2	SoCal Gas 2	14-234	14-339

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June 25, 2018

Zita Yu, Ph.D., P.E.
 Project Manager
 West Basin Municipal Water District
 17140 South Avalon Boulevard, Suite 210
 Carson, California 90746-1296

Sent via e-mail to: DesalEIR@WestBasin.org

**RE: City of Carson Comments on West Basin Municipal Water District Ocean
 Desalination Draft Environmental Impact Report**

Dear Dr. Yu:

City of Carson would like to thank you for this opportunity to comment on West Basin Municipal Water District’s (West Basin) Draft Environmental Impact Report (DEIR) for the proposed Ocean Water Desalination Project (Project).

While we do not oppose ocean desalination all together, we strongly believe West Basin should only pursue this half-billion-dollar Project as an option of last resort. As such, in 2016, the California State Assembly Select Committee on Water Consumption and Alternative Sources held public hearings throughout California to study the effect of the drought and climate change on the State’s water resources. The Select Committee recommended that the State pursue a diverse water portfolio to deal with these environmental issues. However, the committee recommended that “desalination should be used as an option of last resort.” The Committee found that desalination should “only be considered after a region has been successful with conservation and has embarked on substantial water reclamation projects as well.” We wholeheartedly agree.

CARS-1

West Basin’s longstanding and seemingly steadfast commitment to ocean-water desalination at all cost and over less expensive and more energy friendly means of increasing our water supply—conservation, recycling, stormwater capture, and brackish groundwater desalination—will result in a significant and disproportionate impact on low income and minority populations.

CARS-2

The Project would produce *the* most expensive water¹ in an unnecessary amount² for a vast service area that encompasses widely disparate communities, the most disadvantaged of which, such as Carson, will bear the brunt of the Project’s high costs, adverse environmental impacts and oversized energy use.

The disparity between West Basin’s affluent communities and its low-income and minority neighborhoods such as Carson is evident in the differences in residential per capita water usage (R-GPCD). West Basin seeks to impose the steep costs of building and operating an ocean desalination plant across its entire service area, even though customers in affluent communities such as Palos Verdes use upwards of 200 R-GPCD, while customers in Hawthorne use only 62 R-GPCD, (DEIR, p. 7-13.).³ In this scenario, low income and minority communities such as Carson, whose water use is below the average for the South Coast region,⁴ are subsidizing wealthier communities’ excessive, above average water consumption. Additionally, when water rates go up, as they inevitably will, a \$10 increase that seems modest in affluent Rolling Hills Estates has a significantly greater impact on a ratepayer living below the federal poverty line in disadvantaged communities. Desalination costs range in per acre foot from \$2,600.00 to \$4,500.00. The West Basin Report studied more cost-effective alternative water supplies, including conservation measures and stepped up use of reclaimed water. The costs of conserved water would range from \$580.00 to \$1,400.00 per acre foot. In addition, common-sense programs that detect water system leaks in the water distribution system can result in saving 260,000 gallons per mile of water mains annually at an estimated cost of \$400.00 per acre foot.

CARS-2

We applaud West Basin’s significant conservation savings over the past 25 years, but challenge West Basin’s assertion that demand has hardened to a point which makes it difficult to realize the additional savings West Basin claims is needed with anything less than an ocean desalination plant. In fact, when statewide conservation measures were in place, West Basin’s own conservation efforts completely eliminated the need for a 20 MGD ocean desalination facility.⁵

CARS-3

West Basin’s contention that its Project’s impact on disadvantaged communities is less than significant does not tell the whole story. First, the DEIR leaves out multiple low-income or minority populations (such as Carson) by analyzing only tracts where aboveground infrastructure would be implemented (El Segundo and Hawthorne).⁶ (DEIR, 5-13.) Second, it compares the impacts on tracts in Hawthorne to those on the city of Hawthorne itself, rather than to the West

CARS-4

¹ Heather Cooley and Rapichan Phurisamban, *The Cost of Alternative Water Supply and Efficiency Options in California*, 13, PACIFIC INSTITUTE (June 6, 2018),

http://pacinst.org/wp-content/uploads/2016/10/PI_TheCostofAlternativeWaterSupplyEfficiencyOptionsinCA.pdf.

² Comment Letter from Los Angeles Waterkeeper to West Basin Municipal Water District (explaining that the need for 21,500 acre-feet a year of new potable water supply is not supported in the DEIR).

³ *August Supplier Conservation*, 9, 10 (June 6, 2018),

https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/2017oct/supplierconservation_100317.pdf.

⁴ From July 2017 to August 2017 alone the average residential per capita water use for the South Coast region decreased from 69.63 R-GPCD to 65.87 R-GPCD. (89.3 KPCC, *Is California Water Use Increasing?*

<http://projects.scprr.org/applications/monthly-water-use/region/south-coast/>.)

⁵ See Comment Letter from Los Angeles Waterkeeper to West Basin Municipal Water District.

⁶ Environmental Science Associates Et Al., *Ocean Water Desalination Project Draft Environmental Impact Report*, 6-13, SMARTER WATER LA (June 6, 2018),

http://westbasindesal.org/assets/Documents%20and%20Files/Project%20Materials/draft-eir/West_Basin_DEIR.pdf.

Basin service area as a whole, which is inappropriate and misleading.⁷ (DEIR, 6-11.) As the Project would provide a water supply for all customers in West Basin’s service area, the relative impacts of the Project on disadvantaged communities should be compared to the service area as a whole. Third, West Basin misrepresents Hawthorne’s demographics by averaging minority populations of three separate tracts before comparing them to Hawthorne as a whole, thus diluting the actual minority percentages of individual tracts.⁸ (DEIR, 6-11.) West Basin then misleadingly concludes that the impact on these areas is not disproportionate because they do not impact significantly greater minority populations. The criteria West Basin used to determine what constitutes significantly greater minority populations—“at least 10 percent greater on average than the overall city or census-designated place”—seems arbitrary, again minimizing both the existence of, and the Project’s impact on, disadvantaged communities.⁹ (DEIR, 6-10.)

CARS-4

Many of West Basin’s low-income and minority customers already suffer from poor air quality in communities identified as being among those most disproportionately burdened by multiple sources of pollution.¹⁰ The high energy intensity of desalination, at five times greater than that of purified recycled water, is of particular concern.¹¹ The continuous energy demand of the 20 MGD desalination plant will be as much as the equivalent energy demand of all of the 14,173 households in Manhattan Beach.¹² West Basin also reports “significant and unavoidable” construction-related impacts of NOx emissions will result from the Project, and such impacts will hit these already affected communities hardest.¹³ (DEIR, 5.2-59.) The immense energy demand of the proposed 20 MGD plant will result in the contribution of roughly 44,000 metric tons annually of CO_{2e}, undermining California’s climate progress and fueling further warming and drought.¹⁴ Increasing our carbon footprint is certainly not the direction in which California ought to be headed.

CARS-5

In addition to CO_{2e} emissions greatly affecting air quality in the region, operation will be a major step backward from the progress West Basin has made to fight climate change. As West Basin self-reports, their Edward C. Little Water Recycling Facility has “reduced emissions of [CO_{2e}] by over 356 tons in one year’s time.”¹⁵

CARS-6

The Pacific Institute studied the energy and greenhouse gas emissions related to ocean desalination, as compared with other more costs effective sources of water. The Fact Sheet provided by West Basin indicates that ocean water desalination will use approximately 50% more energy than imported water from the Metropolitan Water District. The amount of electrical use needed to purify the seawater per acre foot is estimated at 4,200 kWh. The amount of

⁷ Id. at 6-11.

⁸ Id.

⁹ Id. at 6-10.

¹⁰ *CalEnvrioScreen 3.0 Results*, oehha.ca.gov (June 6, 2018), <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

¹¹ Powers Engineering, *Assessment of Energy Intensity and Greenhouse Emissions of Proposed West Basin Desalination Plant and Water Supply Alternatives*, 1, Smarter Water LA (June 6, 2018), https://www.smarterwaterla.org/wp-content/uploads/2018/01/Powers_Engineering_2018_WB_Desal.pdf.

¹² Powers Engineering, *supra* note 11, at 1.

¹³ Environmental Science Associates et al., *supra* note 5, at 5.2-59.

¹⁴ Powers Engineering, *supra* note 11, at 1.

¹⁵ *Edward C. Little Water Recycling Facility*, westbasin.org (June 6, 2018), <http://www.westbasin.org/water-supplies-recycled-water/facilities>.

electricity consumed in the State Water Project energy is 3,500 kWh and the Colorado River Aqueduct is 2,500 kWh per acre foot.

CARS-6

The bottom line is that ocean desalination is not the answer, and we call on West Basin to take a step back and see that the Project’s costs overwhelmingly outweigh any benefit, particularly in light of the more cost-effective, environmentally sound options available for meeting our water supply needs. Operation of an ocean desalination plant will have the perverse result of low-income communities subsidizing West Basin’s most affluent communities’ excessive water consumption. In addition, the Project will adversely impact air quality and contribute to climate change impacts on communities that already bear a disproportionate pollution burden.¹⁶ West Basin should be exploring opportunities for expanding its successful conservation and recycling programs and other water supply options that do not compromise the health and economic well-being of communities. Ocean desalination should be considered an option of last resort and one that West Basin should not be pursuing at this time.

CARS-7

Other More Cost-Effective Options than Ocean Desalination

In June of 2016 the Water Replenishment District of Southern California (WRD) awarded a \$110 million contract to construct a state of art water treatment plant to enable WRD to develop the first locally sustainable groundwater basins in California. Known as the Groundwater Reliability Improvement Project (GRIP), when completed it will allow WRD to replenish both the Central and West groundwater basins. Carson is located above the West Basin groundwater basin. The GRIP project will replace the annual need for 21,000 acre feet of water imported from Northern California and from the Colorado River. The project will purify treated tertiary water for infiltration into the groundwater basins.

CARS-8

Carson is the host city for the Joint Water Pollution Plant (JWPP) operated by the Los Angeles County Sanitation Districts, which treats sanitary sewer discharges from dozens of cities surrounding the city. The City of Carson is a member agency of the LACSD, along with 76 other cities in Los Angeles County. The JWPP currently treats and cleans wastewater discharged from homes and businesses. In September of 2017 the LACSD entered into an agreement with the Metropolitan Water District to construct a \$17 million demonstration facility to purify water for recharging into four groundwater basins. When completed next year the plant will process 500,000 gallons-per-day. Under a full-scale program, the purified water would be pumped from Carson through a new pipeline network to four groundwater basins, allowing for additional groundwater storage. The full-scale program would supply 150 million gallons-per-day of purified water, sufficient to supply 350,000 homes. The cost per acre foot is estimated at 1,600 an acre-foot, which is comparable to other new local water supplies.

In addition, the City of Carson is concerned with the unnecessary expenditure of public funds for such a facility that will not increase the supply of water at a cost efficient method consistent with existing water conservation and reclamation projects serving the City of Carson. The City of Carson supports environmentally sensitive and sustainable methods and projects as alternatives as described in the body of our comments to the proposed project in the Draft Environmental Impact Report.

CARS-9

¹⁶ CalEnviroScreen 3.0 Results, oehha.ca.gov (June 6, 2018), <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

The City of Carson appreciates the opportunity to provide our comments regarding the West Basin Ocean Water Desalination Project. If you have any questions, I may be reached at (310) 952-1728.

┌ CARS-10

Sincerely,



Kenneth C. Parfsing
City Manager

cc: Carson City Council
John Raymond, Assistant City Manager
Saied Naaseh, Community Development Director
Sunny Soltani, City Attorney

CITY OF CULVER CITY

9770 CULVER BOULEVARD
CULVER CITY, CALIFORNIA 90232-0507
CITY HALL Tel. (310) 253-6000
FAX (310) 253-6010

THOMAS AUJERO SMALL
MAYOR

MEGHAN SAHLI-WELLS
VICE MAYOR

COUNCIL MEMBERS
GÖRAN ERIKSSON
ALEX FISCH
DANIEL LEE

June 4, 2018

West Basin Municipal Water District
ATTN: Zita Yu, Ph.D., P.E., Project Manager
17140 South Avalon Boulevard
Carson, CA, 90745

To whom it may concern:

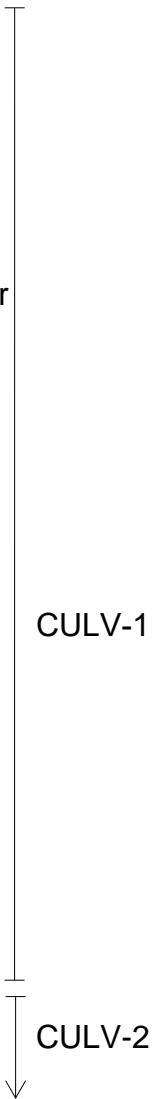
The City of Culver City wishes to thank the West Basin Municipal Water District (West Basin) for the opportunity to review the draft Environmental Impact Report (EIR) for its Ocean Water Desalination Project. This letter, sent on behalf of the City of Culver City, emphasizes the City’s position on water conservation and environmental impacts and summarizes the official comments to the draft EIR.

At the May 14, 2018 City Council meeting, West Basin presented an overview of the Project and explained that West Basin intends to reduce the purchase of imported water from the Metropolitan Water District as part of its long term plans for securing a reliable local water source. This includes diversifying its water portfolio through the proposed Ocean Water Desalination Project.

Culver City greatly appreciates the continued partnership with West Basin and commends West Basin for the robust recycled water and water conservation programs. The City maintains a strong policy position on environment sustainability, supporting and prioritizing programs that:

- Seek the expanded use of recycled water.
- Fund City water conservation programs to reduce demands on the local water supply.
- Conserve water and increase a sustainable, affordable, and local water supply for Culver City.
- Continue partnerships to advance recycling, groundwater cleanup, and stormwater capture as the largest elements in the community’s water portfolio.
- Increase the City’s ability to comply with environmental regulations.
- Improve air quality in Culver City and surrounding areas.

As such, the City respectfully encourages West Basin to support the prioritization of different technologies that focus on conservation and use of recycled water. The City



West Basin Municipal Water District
June 4, 2018
Page 2

understands that desalination technology could be a viable solution to water supply in the future. However, at the present time, the City is particularly concerned with the intense energy consumption of the project, the unknown and overriding financial costs, and the impact to local marine life. It is our opinion that alternative technologies such as water reclamation, recycling, stormwater capture, infiltration, and conservation have not been fully exhausted, are less costly, and environmentally preferable.

↑
CULV-2

For years, the City has asked for the expanded availability of recycled water, which could serve the industrial facilities and 100-plus acres of park and green space in Culver City. It is our understanding that between 150 and 250 MGD of discharge from Hyperion is potentially available for this purpose. The City believes that there are better opportunities that could be pursued before choosing desalination as an option. So we support the continued efforts to research and study the direct use of recycled water for all non-potable uses and potable uses in the future.

CULV-3

For all these reasons, we oppose this project at this time until other environmentally preferable alternatives are fully developed and all other options discussed above are exhausted.

CULV-4

Thank you for your consideration.

Sincerely,

Thomas Aujero Small
Mayor

cc: The Honorable Members of the City Council
John M. Nachbar, City Manager

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

The City of Culver City appreciates the opportunity to review and provide comments to the Draft Environmental Impact Report for the Ocean Water Desalination Project. The City respectfully submits the following comments.

1. To the extent feasible Culver City supports further expansion of recycled water use in the West Basin as an alternative to desalinization. This would offset the use of potable water and therefore act as a virtual new water supply and would further reduce the amount of treated sewage that Hyperion is releasing to Santa Monica Bay. We understand that between 150 and 250 MGD of discharge from Hyperion is still potentially available for this purpose. Culver City has over 100 acres of parks that would benefit from an expanded recycled water supply and distribution system. In addition, the potential for use of recycled water by the industrial and commercial sectors of Culver City should be explored.

CULV-5

2. We are concerned with the cost of desalinization when compared with other alternatives such as expanding recycled water production. While we understand that a financial analysis is not required as part of environmental review, we are especially concerned that detailed economic analysis of the construction and operating costs of a desalinization facility has not been conducted. The implications regarding impacts on the cost of water for the West Basin service area need to be further evaluated.

CULV-6

3. We are concerned with the environmental impact of the proposed desalinization project especially in terms of energy use and GHG production. Other more environmentally favorable alternatives such as expansion of recycled water production should be exhausted before pursuing the desalinization alternative.

CULV-7

4. Since the proposed desalination facility is so sensitive to energy costs, what protections are proposed to ensure long term economic feasibility of operating the facility in the event of large increases in energy costs in the future? There are a number of examples of desalinization facilities that have been shut down due to economic infeasibility. Again, although a review of financial considerations are not required as part of environmental review, we feel this is such an important consideration that it should be studied before any further actions are taken to advance this project.

CULV-8

5. All the agencies in the West Basin are facing a difficult challenge to meet stormwater pollution control mandates. We favor multi-benefit approaches to problem solving and this seems to be an area where there can be more coordination between West Basin and the agencies in its service area. One example would be a project sponsored by the Ballona Creek watershed agencies that is currently under development. This project will treat an average of 6.46 MGD through a process of in-line ultraviolet (UV) or ozone disinfection technology and return the clean water to the creek to flow to the ocean. In lieu of returning the treated water to the ocean, some of this water could be diverted to West Basin for further treatment to make it useable as recycled water to serve Culver City or even potentially for direct reuse. More research in the area of stormwater

CULV-9

West Basin Municipal Water District
June 4, 2018
Page 3

capture and reuse is needed. Capture of dry weather and portions of wet weather stormwater flows for treatment and reuse for a regional solution to both stormwater pollution control and water supply is an area that needs further analysis.

↑
CULV-9

- 6. Although any one of the environmentally preferred alternatives to desalinization may not meet the project goals entirely, it is possible that a combination of efforts to increase conservation, increase production and use of recycled water and incorporate stormwater capture, treatment and reuse would achieve the project goals.

↑
CULV-10



City of El Segundo

Department of Planning & Building Safety

June 21, 2018

Elected Officials:

Drew Boyles,
Mayor
Carol Pirszhuk,
Mayor Pro Tem
Dr. Don Brunn,
Council Member
Chris Pimentel,
Council Member
Scot Nicol,
Council Member
Tracy Weaver,
City Clerk
Crista Binder,
City Treasurer

Appointed Officials:

Greg Carpenter,
City Manager
Mark D. Hensley,
City Attorney

Department Directors:

Joseph Lillio,
Finance
Acting Human Resources
Chris Donovan,
Fire Chief
Charles Mallory,
Information Systems
Mark Herbert,
Acting Library Services
Sam Lee,
Planning and
Building Safety
Bill Whalen,
Police Chief
Ken Berkman,
Public Works
Mercedith Petit,
Recreation & Parks

www.elsegundo.org
www.elsegundobusiness.com
www.elsegundo100.org

West Basin Municipal Water District
17140 S Avalon Blvd
Carson, CA 90746

Re; Draft EIR: Ocean Water Desalination Plant

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Ocean Water Desalination Plant. El Segundo is the home of the two proposed sites for the desalination plant so the City functions as a Responsible Agency under CEQA for this project. As such, comments are restricted to our areas of expertise and focused on matters subject to the City's exercise of powers, as related to the specific proposed project. The following comments are offered:

ELSEG-1

The water desalination plant project proposed in the DEIR thoroughly addresses the vast majority of environmental issues relating to the construction and operation of the treatment plant as well as the regulatory environmental compliance applicable to such a project.

The following comments are from the El Segundo Fire Department.

The proposed sites for the construction of the plant have a past history of heavy industrial chemical and hazardous materials use, as identified in the report. A comprehensive Site characterization and possibly a site remediation plan should be prepared, submitted to the CUPA, and approved to delimit the size and extension of any contamination found. This will require regulatory oversight. The Environmental Safety Division of the El Segundo Fire Department (ESFD) does issue a voluntary cleanup oversight option with DTSC as the lead agency for determination of remedial action and final clean up or further requirements. If the construction activity includes demolition of existing structures asbestos might be present requiring additional determination and hazardous waste disposal restrictions. In addition to that, only trained workers can perform asbestos removal.

ELSEG-2

On page 3-41, the Permit/Approval identified for CUPA is listed as a Hazardous Waste Generator Permit (Small Quantity). The ESFD disagrees with that statement. Due to the nature of the facility operations, it is expected for the plant to be permitted, regulated and routinely inspected by ESFD CUPA in more than one program. The site will most likely need permits in the following CUPA Programs:

ELSEG-3

Hazardous Materials Business Plan: Due to reportable amounts of hazardous materials being stored at this site, below is a chart of typically used hazardous materials in water desalination process:

Sodium Hypochlorite	Prevent Biological Growth, Disinfection
Ferric Sulfate	Enhance Filter Performance
Polymer	Enhance Filter Performance
Sulfuric Acid	Positive LSI to Membranes
Sodium Bisulfate	Remove Chlorine
Carbon Dioxide	Stabilize Product Water
Lime	Stabilize Product Water
Ammonia	Disinfection

In addition to the water treatment chemicals, other hazardous materials for plant maintenance and operation include:

Diesel	Emergency Generator
Propane/LPG	Forklift, warehousing

Hazardous Waste Generator Program: This facility will likely generate hazardous waste routinely as part of their operation and maintenance program, the type and quantity of waste generated will vary by process, however this site will likely generate hazardous waste to be in the RCRA (federal) and Large Quantity Generator (LQG) categories, both regulated by ESFD CUPA. Typically, onsite storage of disinfection chemicals (chlorine and ammonia) presents the greatest potential for toxic vapor plume release and associated public health risk due to the chemical properties of these disinfectants.

CAL ARP: This site will store and handle quantities of hazardous materials included in the regulated substance list for CAL ARP, (ammonia and chlorine). The environmental Impact report does not specify clearly what type of chemicals will be used, however, if used in the gas form, both chemicals will need to be evaluated and permitted for CAL ARP purposes. It is expected however that the site will use less hazardous solutions and or concentration of these chemicals.

APSA: because the plant will or could have an emergency generator depending on the volume of fuel stored at the site (>1320 Gal) and APSA permit and SPCC will be required.

Tier Permit: The water quantity and quality does not meet the criteria for hazardous waste and the plant and the treatment process proposed will not be subject to Tiered Permit requirements. However the water desalination plant discharge does meet the permit requirements for NPDES program and regulation. The Public Works division of the City of El Segundo is the responsible agency for compliance of Industrial wastewater and NPDES.

Program	HMBP	HW	APSA	UST	Cal ARP	Tier Permit
Permit	Required	Required	Required	NA	**	NA
Construction	Required	Required	NA	NA	NA	NA
Operation	Required	Required	Required	NA	**	NA

** Determination based on the chemicals need to be completed

ELSEG-3

Storage of Hazardous Materials: Many of the individual chemicals may not present significant fire and explosion hazards. Nonetheless, some of the chemicals are incompatible and their accidental mixing due to human errors or catastrophic events may present a fire or explosion risk. The following chemicals are incompatible when mixed and their mixing may result in excessive emissions of heat or volatile hazardous substances:

- Sodium Hypochlorite—incompatible and reactive with ammonia, ferric sulfate and polymers;
- Ferric Sulfate—incompatible with sodium hypochlorite;
- Polymer—incompatible with sodium hypochlorite;
- Sulfuric Acid—reacts violently with water;
- Sodium Bisulfite—incompatible with sulfuric acid and sodium hypochlorite;
- Carbon Dioxide—no incompatibility;
- Lime—no incompatibility (if stored in dry form);
- Ammonia—incompatible with sulfuric acid and sodium hypochlorite.

ELSEG-3

Non hazardous materials issues (Odors and emissions): Because of chemicals historically used in the proposed site and the nature of construction and removal of those chemicals, odor complaints may be an important issue for the surrounding communities. An increase in calls and complaints to the ESFD could be expected. Chemicals used in the water desalination process, the reverse osmosis membrane regeneration and storage of hazardous materials can be a source of complaints if not properly controlled by plant personnel and or engineering. Specifically important are ammonia compounds and chlorine bleach since they have pungent odors easily detectable by members of the surrounding areas.

Sincerely,



Gregg McClain
Planning Manager



Hawthorne, California

Department of Planning and Community Development

SENT VIA EMAIL

May 21, 2018

West Basin Municipal Water District
Attn: Zita Yu, Ph.D., P.E., Project Manager
17140 South Avalon Boulevard
Carson, CA 90746

Subject: Ocean Water Desalination Project Draft EIR

Dear Ms. Yu:

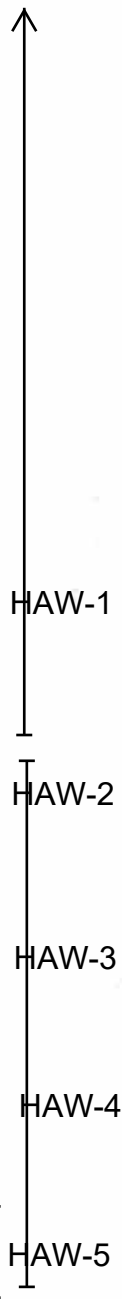
The City of Hawthorne appreciates the opportunity to comment on the Draft EIR for the Ocean Water Desalination Project. The Draft EIR identifies both the preferred route and alternative routes of water conveyance lines that are proposed to extend through the City of Hawthorne. Accordingly, the City of Hawthorne will play a critical role in the Water Desalination Project and has the following comments on the Draft EIR and project design:

- An encroachment permit, construction phasing plan, and traffic safety/routing plan for the components of the project that are proposed in the City of Hawthorne shall be reviewed and approved by the City Engineer prior to commencement of construction in the City's jurisdiction.
- As all of the proposed conveyances are on streets that have or will have been recently paved, the City will require full width paving with ARHM from gutter to gutter on these streets after installation of these pipelines to restore the streets to their existing, pre-installation conditions.
- The EIR should specifically identify the City of Hawthorne as a Responsible Agency and note the project components (preferred and alternative routes) for which the City of Hawthorne would provide approvals.

If you have additional question, please feel free to contact me at 310-349-2970.

Sincerely,

Brian James
Director of Planning and Community Development



Comment Letter HERMOSA BEACH



June 25, 2018

Zita Yu, Ph.D., P.E.
Project Manager
West Basin Municipal Water District
17140 South Avalon Boulevard, Suite 210
Carson, California 90746-1296

This letter is submitted on behalf of the City of Hermosa Beach, in response to the Draft Environmental Impact Report (“DEIR”) for the West Basin Municipal Water District Ocean Water Desalination Project (“the Project”). The City Council of Hermosa Beach has voted in the past to oppose this project because it would have negative impacts on the environment, and because it is an unduly expensive and unnecessary water supply option.¹

The cost of water produced by seawater desalination has been estimated to be four to eight times higher than alternative sources of water, ranging from \$1,900 to over \$3,000 per acre foot.² As described further in the discussion of the DEIR’s alternatives analysis, Section V.C. below, West Basin has not been forthcoming about the likely cost of the Project’s water, claiming without quantitative support that the water they produce will “control water costs and provide long term price stability”.³ We are concerned that there is significant “demand risk” presented by the Project: our water demand can be met by less expensive sources of water, and there is risk that the Project will create an unnecessary financial burden for rate payers and municipalities.⁴ The financial risk of the Project is illustrated by Australia’s experience building six large-scale seawater desalination plants at a cost of \$10 billion.⁵ Those plants were abandoned or operate at reduced capacity, in favor of efficiency and other more cost-effective water supply alternatives.

HBCH-1

The City of Hermosa Beach strongly prefers to focus its water supply portfolio on readily available lower-cost and lower-impacts alternatives including water conservation, water efficiency, stormwater capture, and water recycling. We encourage West Basin to continue to pursue water supply options other than seawater desalination. For example, the Water Replenishment District of Southern California expects that it can supply 57,770 acre feet per year (AFY) of additional groundwater production to offset imported water demands with stormwater, tertiary recycled water and advanced treatment recycled water.⁶

HBCH-2

In addition to our position that pursuing seawater desalination is neither necessary nor appropriate, we have concerns with the Project and the assessment of environmental impacts in the DEIR. We have identified the following issues with the DEIR, described further, below:

- **The environmental review fails to present substantial evidence that marine biological and water quality impacts are less than significant or can be mitigated.** The DEIR is flawed in limiting analysis of marine impacts to an arbitrary and inappropriately small study area, rather than evaluating impacts on the Santa Monica Bay and cumulative impacts at the level of the Southern California Bight. The DEIR

HBCH-3

¹ Staff Report and City of Manhattan Beach “Letter Opposing Construction of a Water Desalination Plant by West Basin Municipal Water District”, February 16, 2016, <http://www.citymb.info/home/showdocument?id=22699>.

² NRDC et al. PROCEED WITH CAUTION II: CALIFORNIA’S DROUGHTS AND DESALINATION IN CONTEXT, (2016) at 3 <https://www.nrdc.org/sites/default/files/california-drought-desalination-2-ib.pdf>

³ DEIR at 7-3.

⁴ PROCEED WITH CAUTION II at 7.

⁵ *Id.*

⁶ CH2M HILL, ENGINEERS, INC. GROUNDWATER BASINS MASTER PLAN, FINAL REPORT, Water Replenishment District of Southern California (2016) http://www.wrd.org/sites/pr/files/GBMP_FinalReport_Text%20and%20Appendicies.pdf



has failed to account for impacts to important sensitive resources, particularly marine protected areas. The document unreasonably dismisses potentially significant marine biological and water quality impacts, despite gaps in relevant information.

- **The Project is likely to have significant energy impacts;** yet the DEIR’s assessment of energy impacts, energy efficiency and waste is deficient.
- **The Project is unjustified in taking credit for speculative greenhouse gas reductions** that potentially could be achieved if desalination offsets the volume of imported water utilized, because there is no guarantee that the Project will result in such an offset.
- **The DEIR fails to account for the significant impacts of developing a new water source at a vulnerable beach location.** The analysis unreasonably disregards state policy and best practices to address public safety, disaster preparedness, climate change and sea level rise.
- **The DEIR’s alternatives analysis fails to address significant environmental impacts,** and it rules out feasible alternatives that would address significant impacts, based on arbitrary criteria and unsupported conclusions.
- **Mitigation proposed for significant marine biological, water quality, energy, greenhouse gas, coastl hazard and cumulatives impacts is speculative or wholly inadequate,** because the impacts themselves have not been accurately presented.
- **The analysis of the a Regional Project of 60 MGD is insufficient** as it purports to tier off the impact assessment of the Local Project of 20 MGD, but that is impermissible and fails to adequately account for the potential impacts of the larger project.

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HBCH-3

I. The Project DEIR fails to present substantial evidence that marine biological and water quality impacts are less than significant or can be mitigated.

West Basin’s DEIR is deficient because it evaluates the impacts the Project would have only to a limited marine study area, which fails to account for significant impacts that could result from the transport of marine life and pollutants throughout the Santa Monica Bay and the Southern California Bight. Particularly if the appropriate threshold of significance, based on the California Ocean Plan Desalination Amendment (“Desal Amendment”), is applied, i.e. that the Project “minimize intakes and mortality to all forms of life”, it is clear that the DEIR has not presented substantial evidence that marine biological and water quality impacts are less than significant or can be mitigated.

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HBCH-4

A. The DEIR has designated a limited marine study area which excludes consideration of significant environmental impacts of the Project to marine biological and water quality in the Santa Monica Bay.

Under California law, West Basin must analyze whether the Project will have a significant effect on the environment, which is the extent to which it will cause “substantial adverse change in the physical conditions which exist in the area affected by the proposed project.”⁷ In conducting this analysis, the DEIR is required to include a description of the environmental setting of the project, which is “ the physical environmental conditions in the vicinity of the project ... This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”⁸

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HBCH-5
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⁷ CEQA Guidelines § 15002 (g).

⁸ CEQA Guidelines § 15125 (a).

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West Basin acknowledged that Santa Monica Bay (“SMB” or “the Bay”) is the environmental setting in which the Project will occur.⁹ However, in DEIR Section 5.9.2 “Study Area”, the “marine study area” is described as: A 2- mile by 1.5-mile area of marine waters and seafloor extending 1.5 miles offshore and 1 mile up-coast and down-coast of the proposed desalination discharge and seawater intake facilities.¹⁰

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HBCH-5

Throughout the document, the DEIR acknowledges that there are habitat and species of concern within SMB, but the review discounts the likely impacts of the Project on these resources by assessing only the extent to which they are present in the much more geographically limited marine study area. The DEIR states that: Based on the absence of suitable habitat in the Project marine study area, the absence of substantial larval densities of special-status species in the Project marine study area, and the natural life history of special-status species of concern present in the Project marine study area, the potential for entrainment of these special-status species is negligible to non-existent. Therefore, the impact would be less than significant.¹¹

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HBCH-6

This approach fails to consider the many studies establishing that the habitats and biological communities of the entire SMB are connected by a complex system of currents, the movement of marine life, and an array of anthropogenic impacts in this highly developed region. For example, in SMB: Many nearshore fish and invertebrates have a life cycle that includes an obligate pelagic larval stage that can last from a few days to several months. Due to the small size of marine larvae, advection by coastal circulations is the dominant process driving larval dispersal which will have an order one influence on their fish stock dynamics.¹²

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HBCH-6

Study of connectivity in the Southern California Bight has found significant transport of water between mainland sites in SMB and the Channel Islands. “Effective marine management depends upon an explicit knowledge of dispersal as a result of ocean circulation.”¹³ It is essential for the DEIR to account for the fact that ocean circulation can cause both the dispersal of marine species larvae, which could cause far greater impacts than are acknowledged in the DEIR, including impacts to larvae, and dispersal of the brine and pollutants released as a by-product of desalination.

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HBCH-7

Currents and ocean circulation patterns are likely to disperse the pollutants released by the Project far beyond the marine study area. The Project could therefore cause significant water quality impacts to a much broader area of SMB than acknowledged by the DEIR.¹⁴ The DEIR has not incorporated readily available substantial evidence, such as the peer reviewed studies referenced in this comment letter, which indicates that the impacts of increased salinity and lowered dissolved oxygen from brine discharges, and release of other contaminants from the Project operations, could be significant and reach far beyond the marine study area.¹⁵

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HBCH-7

⁹ DEIR at 5.11-10.
¹⁰ DEIR at 5.9-25. However, Section 5.11.2 describes the marine study area slightly differently, using nautical miles: “an area extending approximately 1 nautical mile upcoast and downcoast of the terminus points of the ESGS intake and outfall pipelines and situated parallel to the shoreline and extending approximately 1.5 nautical miles offshore from the beach, ending in approximately 90 feet of water,” DEIR at 5.11-10.
¹¹ DEIR at 511-54.
¹² S. Mitarai et al., *Quantifying connectivity in the coastal ocean with application to the Southern California Bight* 114 J. OF GEOPHYSICAL RES. C10026, (2009), <https://doi.org/10.1029/2008JC005166>
<https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1029/2008JC005166>.
¹³ *Id.*
¹⁴ S. Mitarai et al., *Quantifying connectivity in the coastal ocean with application to the Southern California Bight* 114 J. OF GEOPHYSICAL RES. C10026, (2009), <https://doi.org/10.1029/2008JC005166>
<https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1029/2008JC005166>.
¹⁵ E.g. DEIR at 5-11-58.



At a minimum, the Santa Monica Bay as a whole, rather than the DEIR’s limited marine study area, should be the area evaluated for impacts caused by the Project.

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B. The DEIR has not accounted for potential impacts to significant ecological areas, particularly marine protected areas.

The DEIR acknowledges the presence of significant ecological areas in Santa Monica Bay, including the Mugu Lagoon to Latigo Point Area of Biological Significance 18 miles northwest of the Project area, the Point Dume State Marine Conservation Area (“SMCA”) and State Marine Reserve (“SMR”) 22 miles northwest of the Project area, and the Palos Verdes SMCA and SMR 7 miles south of the Project area.¹⁶ However, the DEIR has not evaluated the impacts the Project may have to the health and biological function of these marine protected areas (“MPAs”), and the DEIR lacks evidence to establish that the MPA’s distance is far enough from the Project that it will not have significant negative impacts on these areas.

Under the Marine Life Protection Act, California created a world-class network of marine protected areas that were carefully designed, with extensive expert input, to support connectivity between the areas. While the Project is not located within a protected area, it is located between the Point Dume and Palos Verdes MPAs, between which marine life is expected to transit and have the potential to be impacted by the Project along the way.

HBCH-9

[M]ost marine invertebrates and fishes produce young (eggs, larvae) that are typically dispersed by ocean currents over great distances (10's to 100's of kilometers). Thus much of the population connectivity achieved by marine species is by the transport of their young from one population to another in spatially separated similar habitats ... This export of individuals from one local population to another, which may be protected by one or more MPAs, influences both the role of MPAs for conservation and management and the design (e.g. size and spacing) of MPAs. These elements of population connectivity are critically important to MPAs and MPA networks.¹⁷

As described above, the assessment of the Project’s marine and water quality impacts is based on evaluation of a small rectangular area within the Santa Monica Bay. The entire SMB is the appropriate “marine study area”, and all assessments of impacts in the DEIR should be revised to ensure that they account for the movement of water and marine life throughout that body of water and the associated impact on the MPAs bordering the Bay.

C. The Southern California Bight is the appropriate area for consideration of regional impacts of the Project.

Assessment of the Project’s impacts to the marine environment of Santa Monica Bay is the minimum spatial scale that is reasonable, given the circulation patterns and interconnectivity of the broader marine region known as the Southern California Bight (“SCB”), in which SMB is situated. CEQA requires that significant environmental impacts be considered in the “full environmental context”:

HBCH-10

Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.¹⁸

¹⁶ DEIR at 5.11-34 to 5.11-36.

¹⁷ M. Carr et al., *The central importance of ecological spatial connectivity to effective coastal marine protected areas and to meeting the challenges of climate change in the marine environment*, 27 AQUATIC CONSERVATION S1, (2017), <https://onlinelibrary.wiley.com/doi/abs/10.1002/aqc.2800>

¹⁸ CEQA Guidelines § 15125 (c).

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The Southern California Bight is “the coastal ocean from Point Conception to just south of San Diego and inshore of the Santa Rosa Ridge”.¹⁹ While the DEIR acknowledges that the Project is located in this region, and that there are multiple seawater desalination facilities within the SCB²⁰, the DEIR fails to consider the features and functions of this marine eco-region when assessing the Project impacts on marine biological resources and water quality impacts. For example, the SCB is characterized by circulation patterns that are more complex than elsewhere off the west coast.²¹ Furthermore, as discussed in the following section, the DEIR acknowledges that the SCB is the relevant geographic range for which to consider significant and cumulative marine impacts.²²

HBCH-10

D. The DEIR’s marine cumulative impact assessment is deficient in evaluating only a narrow set of projects.

The DEIR acknowledges CEQA’s requirement that because the Project has “an incremental effect that is “cumulatively considerable”²³, it is necessary to address “past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the Agency”.²⁴ However, the cumulative assessment of impacts to the marine environment is limited to a brief acknowledgement of only twelve projects.²⁵ The cumulative impact assessment omits consideration of the vast number of anthropogenic activities “producing related or cumulative impacts” to marine life in the Santa Monica Bay and the Southern California Bight.

The SCB is a highly-developed area that is impacted by a wide array of activities. Just as species transit between habitats throughout SMB and the SCB, pollutants and negative impacts are also transported between ecosystems, and this transport and accumulation of pollutants can negatively impact MPAs:

HBCH-11

[S]ome forms of ecosystem connectivity can be detrimental to both recipient and donor ecosystems ... impacts to donor ecosystems that create inhospitable conditions can drive populations from those ecosystems, altering their structure and functions and diminishing their productivity. These impacts can be transmitted from one ecosystem to another by altering ecosystem functions ... The cumulative and distributed negative effects of ecosystem connectivity can translate into lost ecosystem services ...²⁶

The cumulative impact assessment should evaluate the harm to marine life caused by a much wider range of anthropogenic activities in the SCB with effects similar to those anticipated from the Project. As discussed in the comment letter submitted by Heal the Bay, incorporated herein by reference, impacts that should be considered in the cumulative impact assessment include, but are not limited to all relevant point- and non-point sources of pollution in the SCB and noise impacts to marine life.

¹⁹ CIRCULATION IN THE SOUTHERN CALIFORNIA BIGHT, <https://web.csulb.edu/depts/geology/facultypages/bperry/Southern%20California%20Bight/pollution.htm> (last visited April 22, 2018).

²⁰ DEIR at 4-12.

²¹ CIRCULATION IN THE SOUTHERN CALIFORNIA BIGHT, <https://web.csulb.edu/depts/geology/facultypages/bperry/Southern%20California%20Bight/pollution.htm> (last visited April 22, 2018).

²² DEIR at 4-3.

²³ CEQA Guidelines § 15130 (a).

²⁴ CEQA Guidelines § 15130 (b).

²⁵ DEIR at 4-3, 4-11, 4-12.

²⁶ M. Carr et al., *The central importance of ecological spatial connectivity to effective coastal marine protected areas and to meeting the challenges of climate change in the marine environment*, 27 AQUATIC CONSERVATION S1, (2017), <https://onlinelibrary.wiley.com/doi/abs/10.1002/aqc.2800>



E. The objective of the California Ocean Plan Desalination Amendment should be included as a key threshold of significance for water quality and marine biological impacts.

The DEIR applies general CEQA Guidelines thresholds of significance in evaluating the water quality²⁷ and marine biological²⁸ impacts of the Project. However, the CEQA Handbook indicates that where specific regulations particular to the environmental effect in question are available, those should be used as the appropriate threshold of significance.²⁹

The California Ocean Plan Desalination Amendment (“Desal Amendment”) is the regulatory framework adopted specifically to address the water quality and marine biological effects of seawater desalination facilities. The Desal Amendment was adopted by the State Water Resources Control Board (“SWRCB”) in 2015, after publication of substantial evidence, including scientific studies and public input, which is available in the staff record.³⁰ The Desal Amendment requires that desalination projects use best available site, design, and technology to “minimize intakes and mortality to all forms of life”.³¹ The Desal Amendment was adopted to address the fact that seawater desalination projects are known to have significant, long-term environmental effects. The Desal Amendment requires that projects “minimize intakes and mortality to all forms of life” and therefore should be incorporated into the DEIR, rather than the more permissive general thresholds of the CEQA Guidelines.

HBCH-12

While the DEIR acknowledges that the Desal Amendment is salient to the threshold of significance, stating that this regulation was “considered”, the thresholds of significance used do not reflect the key metric applied in the Desal Amendment.³² When assessing water quality and marine biological impacts, the extent to which the Project will “minimize intakes and mortality to all forms of life” should be added and applied as a threshold of significance in the DEIR.

F. Potentially significant marine biological and water quality impacts have not been evaluated or addressed.

Although the requirements of the Desalination Amendment were not used as thresholds of significance, West Basin acknowledges that this is the regulatory standard with which the site, design and technology of the Project must comply. While compliance with the Desal Amendment is necessary, compliance with its guidance alone does not guarantee that the Project will not have significant environmental impacts. A 2016 convening of experts at Stanford University concluded that, despite the promulgation of the Desal Amendment, “[m]ore work is needed to understand the long-term impacts of [desalination] discharges.”³³ The requirements of the Desal Amendment are merely a starting point for best available site, design and technology. Approaches that are “best available” are, by definition, progressively evolving as new studies are conducted, lessons are learned, and technologies are tested and advanced.

HBCH-13

²⁷ DEIR Section 5.9.3.

²⁸ DEIR Section 5.11.3.

²⁹ CEQA Guidelines § 15064.7 (a).

³⁰ See, ST. WATER RESOURCES CONTROL BOARD, FINAL STAFF REPORT INCLUDING THE FINAL SUBSTITUTE ENVIRONMENTAL DOCUMENTATION FOR THE AMENDMENT TO THE WATER QUALITY CONTROL PLAN FOR THE WATERS OF CALIFORNIA, ADDRESSING DESALINATION FACILITY INTAKES, BRINE DISCHARGES, AND THE INCORPORATION OF OTHER NON-SUBSTANTIVE CHANGES, Adopted May 6, 2015, (hereinafter “Final Staff Report for Desal Amendment”), https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/rs2015_0033_sr_apx.pdf

³¹ California Ocean Plan, Desalination Amendment, Chapter III.M.2.a.(2).

³² DEIR at 5.11-36.

³³ MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA at 5.



2. Brine impacts may be significant, yet the DEIR has not addressed key gaps in information and analysis necessary to determine the significance of impacts.

West Basin states that they will be unable to comingle brine with wastewater, which is the “preferred technology for minimizing intake and mortality to all forms of life resulting from brine”⁴⁴ in the Desal Amendment, because sufficient supplies of wastewater will purportedly not be available. Instead, the Project plants to utilize multiport diffusers, which is the Desal Amendment’s “next best method for disposing of brine when the brine cannot be diluted by wastewater”.⁴⁵ The DEIR notes that 25.4 MGD of brine would be discharged for the 20 MGD Project⁴⁶; while an average of 76.2 MGD would be discharged for a 60 MGD Regional Project, although that discharge could peak at 83 to 95 MGD.⁴⁷ However, the impacts of the Project’s brine discharge are not fully understood, because the multiport diffuser “design is not yet finalized”.⁴⁸

HBCH-15

The CEQA Guidelines require that sufficient technical detail be provided to “permit full assessment of significant environmental impacts” of a project.⁴⁹ This Project is highly technical, and modification of the intake or outflow technology can have important implications for the significance of environmental impacts. The DEIR is therefore flawed for failing to finalize and analyze the specific brine dispersal technology that will be utilized.

There are also substantial omissions in the DEIR’s analysis of known impacts of brine disposal. The DEIR fails to acknowledge that potential impacts of brine effluent discharges are poorly understood. For example, desalination brine has been shown to “impact the physiology and growth of seagrass meadows due to osmotic stress around the brine-effluent discharge point”⁵⁰, yet the DEIR does not evaluate the potential impact on seagrass, including important eelgrass beds near the proposed Project.⁵¹ The water temperature of desalination brine effluent can also be elevated by up to 25% over ambient water temperature.⁵² Despite acknowledgement of regulatory requirements related to thermal impacts, the DEIR fails to analyze the Project’s potential thermal impacts.⁵³

HBCH-16

HBCH-17

A 2018 review of the latest available information states that “to date, the effects of brine-effluent discharge on coastal marine ecosystems are poorly understood, [sic] thereby merit further research via controlled bioassay experiments and more importantly long-term monitoring”.⁵⁴ For example, the impacts of desalination brine on

HBCH-18

is hindered by the paucity of information on typical survivorship to maturity for most species. As a result, the overall impact of intake mortality on the marine ecosystem cannot always be quantified reliably.” WATER IN THE WEST, ET AL., MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA, Stanford University, at 4 (2016), http://waterinthewest.stanford.edu/sites/default/files/Desal_Whitepaper_FINAL.pdf.

⁴⁴ California Ocean Plan, Desalination Amendment, Chapter III.M.2.d.(2)(b).

⁴⁵ *Id.*

⁴⁶ DEIR at 3-13.

⁴⁷ DEIR at 3-17; DEIR Appendix 4C. Philip J.W. Roberts, “Modeling Brine Disposal from the West Basin Ocean Water Desalination Project” at 11.

⁴⁸ DEIR Appendix 4C. Philip J.W. Roberts, “Modeling Brine Disposal from the West Basin Ocean Water Desalination Project” at 13.

⁴⁹ CEQA Guidelines § 15147.

⁵⁰ “Impacts of Seawater Desalination on Coastal Environments,” at 448.

⁵¹ *See, e.g.* Brock Bernstein et al. RECOMMENDATIONS FOR A SOUTHERN CALIFORNIA REGIONAL EELGRASS MONITORING PROGRAM, Technical Report 632, May 2011, Southern California Coastal Water Research Project, at 10 http://www.westcoast.fisheries.noaa.gov/publications/habitat/california_eelgrass_mitigation/recommendations_for_monitoring_1_.pdf.

⁵² “Impacts of Seawater Desalination on Coastal Environments,” at 454.

⁵³ DEIR at 5.9-20, 5.9-32, 5.11-4.

⁵⁴ Karen L. Petersen et al. SUSTAINABLE DESALINATION HANDBOOK, Chapter 11, “Impacts of Seawater Desalination on Coastal Environments,” at 440, *available at* <https://www.sciencedirect.com/science/article/pii/B9780128092408000113>



the zooplankton food web, benthic bacteria, benthic meiofauna (e.g. bioindicator species that are highly sensitive to anthropogenic effects such as nematodes) are largely unknown.⁵⁵

While the use of multiport diffusers has been shown to reduce some of the impacts of brine effluent, experts differ on the efficacy of this technology to reduce marine life mortality, particularly given the tradeoffs between dilution and shear mortality caused by the jet force of the diffusers.⁵⁶ To adequately assess the impacts of the Project’s brine on the marine environment, it is essential to both determine which diffuser configuration is going to be used, and to test the impacts of that specific technology. Furthermore, the DEIR must acknowledge and address the significant gaps in analysis of the impacts of the brine effluent.

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HBCH-18

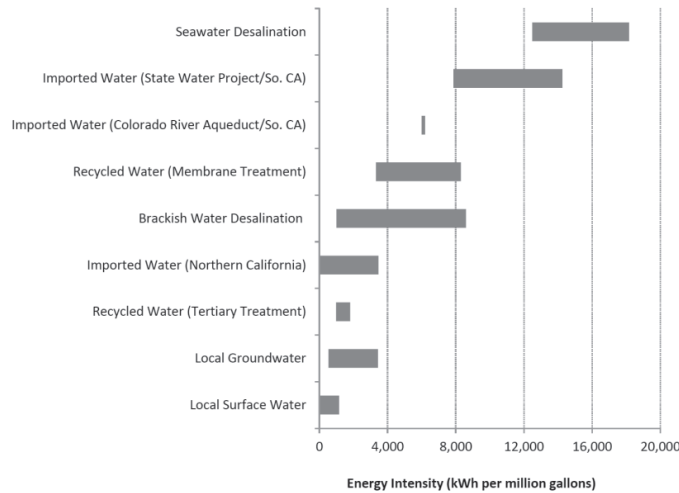
II. The Project is likely to have significant energy impacts; the Project should be reevaluated and the DEIR revised in light of these energy impacts.

A. Analysis of energy efficiency and waste is insufficient.

In assessing energy impacts of the Project, the DEIR acknowledges the applicability of CEQA Guidelines Appendix F., which directs EIRs to place “particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy”.⁵⁷ However, the Project runs counter to this directive, and the DEIR downplays the extent to which seawater desalination is the most energy intensive source of water.

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HBCH-19

The DEIR assesses the Project’s energy use only in comparison to imported water, rather than comparing the energy use of seawater desalination to the even less energy intensive options. The Project is purportedly justified by the need for a diversified water supply, but diversification can still be accomplished without the use of this large-scale desalination plant. The DEIR should demonstrate how much energy seawater desalination uses in comparison to the range of other water supply alternatives, and not only compare the energy impacts of the



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HBCH-20

Project to imported water.

⁵⁵ “Impacts of Seawater Desalination on Coastal Environments,” at 442-445.

⁵⁶ Philip J.W. Roberts, *Brine Diffusers and Shear Mortality*, Final Report for Eastern Research Group, https://www.waterboards.ca.gov/santaana/water_issues/programs/Wastewater/Poseidon/2018/4-18-18_Diffuser_Analysis_Method.pdf Dr. Roberts work appears to be at odds with the assessments conducted by

⁵⁷ DEIR at 5.5-9,-10.



Figure 1. Comparison of the Energy Intensity of California Water Supplies⁵⁸

Despite the length of the document, the DEIR does not reference the preeminent analysis conducted by the Pacific Institute, comparing the energy and GHG emissions of seawater desalination to other water supply options.⁵⁹ This is an important example of significant gaps in the evidence utilized by the DEIR in conducting its analysis.

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HBCH-20

The DEIR also purports to take energy conservation credit for Southern California Edison’s (SCE) generation of additional renewable power to meet the California’s Renewables Portfolio Standard (RPS).⁶⁰ We are aware of no instance in which a project can take credit for the energy savings of a wholly independent entity, merely because it purchases the power from this entity. We are concerned, as discussed below, that the Project actually undermines the RPS.

HBCH-21

In light of the energy intensity of seawater desalination, it is likely that the Project would have significant, unavoidable, energy impacts. The Project should be re-evaluated in light of these impacts.

B. The DEIR does not account for impacts that could undermine grid reliability and SCE’s compliance with the RPS.

The DEIR asserts that the Project will have less than significant impacts on adopted energy conservation plans or on state or federal energy standards.⁶¹ This conclusion is flawed, at a minimum, because it does not fully account for the additional and unplanned load that the project will place on the electrically constrained SCE service area. As the DEIR notes, SCE is transitioning to increased renewable energy production to comply with the RPS. However, the addition of this new project could jeopardize the attainment of RPS goals.

HBCH-22

SCE has added more than 5,000 MW of new generation resources in coastal areas to account for the retirement of old power plants.⁶² However, that addition of new generation was based on projected energy needs that did not include this Project. The energy consumption of this plant could surpass the amount saved by new energy efficiency programs while also placing a peak demand on the system. SCE and the CPUC should be consulted and conduct a third party assessment of the Project’s impacts on energy conservation plans and state and federal energy standards. These agencies’ assessments should be incorporated into a revised and recirculated EIR.

III. The Project erroneously takes credit for GHG reductions related to the offset of imported water, yet there is no guarantee that the project will result in such offset.

The DEIR asserts that the Project – whether developed to the Local or Regional size – “would ensure that there would be no net increase in GHG emissions compared to existing conditions associated with water supplied by MWD,” specifically, imported water, and thus would not represent a significant or cumulative contribution to GHG emissions.⁶³ Seawater desalination is one of the most energy-intensive water options available, and the conclusion that it will not result in significant GHG emissions is unsubstantiated.

HBCH-23

⁵⁸ Heather Cooley, *Key Issues in Seawater Desalination in California: Energy and Greenhouse Gas Emissions*, Pacific Institute at 7 (2013), <http://pacinst.org/publication/energy-and-greenhouse-gas-emissions-of-seawater-desalination-in-california/>

⁵⁹ *Id.*

⁶⁰ DEIR at 5.5-17.

⁶¹ DEIR at 5.5-14 to 5.5-18.

⁶² NRDC et al. *PROCEED WITH CAUTION II: CALIFORNIA’S DROUGHTS AND DESALINATION IN CONTEXT*, (2016), <https://www.nrdc.org/sites/default/files/california-drought-desalination-2-ib.pdf>

⁶³ DEIR at 5.7-38.



The DEIR compares GHG emission of desalination only to the emissions caused by imported water supplied by MWD. Instead, as discussed above, the energy and emissions impacts of the Project should be compared to the range of other water supply options, which use far less energy. The DEIR relies heavily on the assumption that desalinated water will replace imported water, arguing that the significant impacts of the West Basin Project can be justified compared to the impacts of imported water. This argument fails because experts agree that:

HBCH-24

Ocean desalination will not, in the foreseeable future, significantly reduce stress on freshwater resources—particularly freshwater ecosystems. Even the highest total projected production of potable water from ocean desalination in California is so low that it will not meaningfully reduce stress on freshwater systems ...⁶⁴

HBCH-25

The DEIR also implies that there will be a one-for-one replacement of imported water by MWD, asserting that the Project will “reduce dependency on imported water and would not result in a new increase in West Basin’s total water supply portfolio”.⁶⁵ This purported benefit is illusory; it is not a guaranteed outcome because West Basin does not exercise control over the multiple sources from which its retailers purchase water. The California Coastal Commission rejected a similar argument by Poseidon water in Carlsbad, because without a contractual obligation, the new desalinated water could simply meet new increased demand, rather than replacing imported water.

HBCH-26

Finally, the DEIR asserts that the Project will offset the increased energy and emissions impacts of the Project by using renewable energy, where possible. This approach ignores the superior alternative of using renewable energy to offset the GHG emissions of a less energy intensive water source, rather than offsetting new emissions and thereby maintaining current GHG levels.⁶⁶

HBCH-27

IV. Developing a new water source at a vulnerable beach location unreasonably disregards state policy and best practices to address public safety, disaster preparedness, climate change and sea level rise.

The Project’s proposed investment in new infrastructure a few feet above sea level is antithetical to state policy and best practices for responding to rising sea levels and coastal hazards exacerbated by climate change.⁶⁷ The DEIR’s assessment of sea level rise and coastal hazards concludes: “portions of the ESGS Site would be vulnerable to flooding from future coastal flood hazards, including from strong wave surge and tsunami inundation under future sea-level flood hazard conditions.”⁶⁸ The DEIR acknowledges that “operation of the Project on either the ESGS North Site or South Site would result in potentially exposing people or structures to risk of loss, injury or death ... due to sea-level rise.”⁶⁹ The DEIR then makes the unreasonable conclusion that these impacts would be less than significant with mitigation, but this purported mitigation is entirely speculative, as it will be determined by future study and recommendations.⁷⁰ In their comment letter, incorporated herein by

HBCH-28

⁶⁴ Leon Szeptycki, et al., MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA, Water in the West, Center for Ocean Solutions, Monterey Bay Aquarium, The Nature Conservancy, (2016), available at <http://stanford.io/2axdXE7>.

⁶⁵ DEIR at 5.7-37.

⁶⁶ See, Heather Cooley, *Key Issues in Seawater Desalination in California: Energy and Greenhouse Gas Emissions*, Pacific Institute (2013), <http://pacinst.org/publication/energy-and-greenhouse-gas-emissions-of-seawater-desalination-in-california/>

⁶⁷ See, California Coastal Commission, SEA LEVEL RISE POLICY GUIDANCE, August 12, 2015, <https://www.coastal.ca.gov/climate/slrguidance.html>

⁶⁸ DEIR at 5.9-75. See also, Appendix 5B. Technical Memorandum: Coastal Hazards Analysis of the West Basin Municipal Water District Ocean Water Desalination Project for Sea Levels at Year 2100.

⁶⁹ DEIR at 5.9 -76.

⁷⁰ DEIR at 1-21.



reference, Heal the Bay has further described the geologic instability and dangers, which have not been adequately addressed in the DEIR.

As the DEIR acknowledges, the Project is subject to provisions of the Coastal Act, because it is located in the Coastal Zone, and it is a “coastal-dependent” use and a “public works” project that would involve production, storage, and transport of water.⁷¹ While the grant of a Coastal Development Permit and the final determination on Coastal Act consistency will be made by the City of El Segundo and the California Coastal Commission, the DEIR has failed to address critically important risks related to the Project’s location, which is vulnerable to erosion, flooding, earthquakes and sea level rise.⁷² Where there is an opportunity, as in this case, to choose the location of new public infrastructure, it should be located away from vulnerable areas. While the DEIR acknowledges the applicability of the Coastal Commission’s Sea Level Rise Policy Guidance, the analysis is flawed and unreasonable in concluding that there are no significant impacts resulting from the conflict between the Policy and the Project.⁷³ The Project has disregarded the Sea Level Rise Policy Guidance; it should be re-evaluated in light of recommendations, for example, to “relocate or remove existing development out of hazard areas and limit the construction of new development in vulnerable areas.”⁷⁴

HBCH-28

It is unreasonable for West Basin to ignore the opportunity to avoid a range of serious dangers inherent in the Project site by, for example, instead developing less vulnerable water supply options, or at a minimum selecting a site in a less vulnerable location. The Project is likely to endanger public safety and waste significant public resources; the DEIR has failed to address the impacts of sea level rise and coastal hazards inherent in the Project location. It is unacceptable for the DEIR to dismiss these impacts as less than significant with reference to a future study as a mitigation measure.

V. The alternatives analysis fails to address significant environmental impacts; the DEIR unreasonably rules out feasible alternatives based on arbitrary criteria and unsupported conclusions.

A. Alternatives analysis omits consideration of significant impacts.

West Basin asserts that construction-related air quality and noise impacts are the only significant and unavoidable impacts for which alternatives must be considered.⁷⁵ In analyzing project alternatives, West Basin’s analysis is deficient in that it fails to consider the additional significant impacts described above, for which there are reasonable alternatives that could eliminate the impacts, such as those alternatives discussed in Los Angeles Waterkeeper’s comment letter, incorporated herein by reference. In particular, West Basin has not accounted for the significant unavoidable impacts to marine biological resources, water quality, energy, greenhouse gas emissions and climate change dynamics. Those impacts were incorrectly dismissed as less than significant, or the acknowledged significant impacts were dismissed with general claims that future mitigation will address their impacts. The alternatives analysis fails to give sufficient consideration to alternatives that reduce a number of significant impacts. By failing to consider alternatives that address those impacts, West Basin has not made a “reasoned choice” of alternatives as required by CEQA.⁷⁶

HBCH-29

B. The DEIR’s alternatives analysis uses narrow screening criteria to unreasonably remove feasible alternatives from consideration.

HBCH-30

⁷¹ DEIR at 5.10-16.

⁷² http://www.pacinst.org/reports/sea_level_rise/hazmaps/Venice.pdf

⁷³ DEIR at 5.10-16.

⁷⁴ SEA LEVEL RISE POLICY GUIDANCE, Chapter 7: “Adaptation Strategies” at 125.

⁷⁵ DEIR at 7-3 to 7-4.

⁷⁶ CEQA Guidelines § 15126.6(f).



The analysis of the feasibility of a project alternative should be based upon consideration of:
“site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).”⁷⁷

Rather than assessing the broader set of alternatives against these characteristics of feasibility outlined in the CEQA Handbook and the Project objectives, West Basin has applied a set of narrowly drawn “screening criteria” to justify elimination of reasonable, feasible alternatives from consideration.⁷⁸ The initial screening of alternatives” was arbitrarily narrow in requiring that precisely 21,500 AFY average annual additional water supply be generated, as is discussed in Los Angeles Waterkeeper’s comment letter and incorporated by reference herein.⁷⁹

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HBCH-30

Among the alternatives that could reduce environmental impacts and meet basic project objectives, the DEIR has failed to consider a blend of those water supply options such as increased conservation, stormwater capture and increased non-potable recycling.⁸⁰ West Basin should also consider the possibility of a smaller project that could be sited in a less hazardous location and would be capable of utilizing subsurface intakes and powered by renewable energy.⁸¹

C. The alternatives analysis includes unsupported assertions that cost and economic considerations make less impactful alternatives infeasible.

Among the Project’s stated objectives are to “[i]mprove West Basin’s local control of future water costs and long-term price stability”, and to “[d]evelop a potable water supply that is economically viable”. These objectives are suspect, as CEQA guidance instructs project proponents to consider alternatives that avoid or substantially lessen significant effects even if those alternatives would be more costly.⁸² To the extent that consideration of the alternatives’ costs is permissible, West Basin has failed to “include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison to the proposed project.”⁸³

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HBCH-31

The DEIR provides only vague statements, and no quantitative information, about the cost and economic viability of each alternative, while discrediting many of the less impactful alternatives on these grounds.⁸⁴ West Basin’s 2018 FAQ on the Project, in response to the question of “How much will the facility cost, and how will it affect water rates?” states that:

The Project is currently in the environmental phase and a detailed design has not been developed to provide exact cost estimates. West Basin is planning to conduct a future study to evaluate the potential effect on water rates as a result of implementing the Project ...”⁸⁵

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⁷⁷ CEQA Guidelines § 15126.6(f)(1).

⁷⁸ DEIR at 7-5.

⁷⁹ DEIR at 7-6.

⁸⁰ DEIR at 7-8.

⁸¹ Stanford University’s Water in the West Program states that “sustainable seawater desalination projects are those that are smaller; that provide supply to meet a specific, clear local demand; that are located away from sensitive and valuable marine areas; and that are powered by renewable energy sources.” Leon Szeptycki, et al., MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA, Water in the West, Center for Ocean Solutions, Monterey Bay Aquarium, The Nature Conservancy, (2016), available at <http://stanford.io/2axdXE7>.

⁸² CEQA Guidelines § 15126.6 (b).

⁸³ CEQA Guidelines § 15126.6 (d).

⁸⁴ DEIR at 7-3 to 7-59.

⁸⁵ West Basin Ocean Water Desalination Project Frequently Asked Questions (FAQs), 2018 <http://www.westbasindesal.org/assets/Documents%20and%20Files/Project%20Materials/West-Basin-FAQ.pdf>



It is entirely unreasonable for the DEIR to claim that the Project is more cost effective or economically feasible when no quantitative information is provided to compare its costs to the alternatives, and when the prevailing analysis indicates that seawater desalination costs four to eight times more than less environmentally impactful alternatives.⁸⁶

HBCH-31

D. West Basin’s evaluation of the Desalination Amendment’s site, design and technology criteria for evaluating project alternatives should be revised to consider a project that can be configured to minimize impacts.

In an effort to comply with the Desalination Amendment, which “provides a uniform, consistent process for permitting of seawater desalination facilities statewide,”⁸⁷ West Basin has conducted a number of studies to evaluate various options for the Project’s site, design, and technology.⁸⁸ Under CEQA, project proponents have a duty to avoid or minimize environmental damage where feasible, including pursuing feasible alternatives that would “substantially lessen any significant effects that the project would have on the environment.”⁸⁹ The Project was designed first and foremost to produce 20 MGD, with the possibility of being expanded to 60MGD. As discussed in the Los Angeles Waterkeeper’s comment letter and incorporated herein by reference, the volume of water to be produced through seawater desalination is arbitrary and unnecessary. Despite its review of different project configurations, West Basin has rejected options that would produce lower volume of water. If the production volume were changed, then the preferred intake technology of subsurface intakes could be considered.

HBCH-32

Co-location with the El Segundo once-through cooled (OTC) power plant runs counter to reduction of impacts to marine life, because this site is not configured to allow for the use of best available site, design or technology.⁹⁰ In the current Project configuration, the water quality benefits of co-location to utilizing power plant wastewater to dilute desalination brine will be unavailable, because the El Segundo Power Plant will soon phase out, in compliance with the SWRCB’s Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling.⁹¹ West Basin has decided to use wedgewire screens whose effectiveness is not proven, rather than designing a smaller project that could utilize subsurface intakes. Rather than leading with a set volume of water that is to be produced, the Project should be designed at the outset to utilize best available site, design and technology.

HBCH-33

For the reasons described in this section, the alternatives analysis should be revised to thoroughly consider alternative water supply options based on more reasonable project criteria.

VI. A Regional Project of 60 MGD should not be permitted to tier off the DEIR for the Local 20 MGD Project.

HBCH-34

⁸⁶ NRDC et al. PROCEED WITH CAUTION II: CALIFORNIA’S DROUGHTS AND DESALINATION IN CONTEXT, (2016), <https://www.nrdc.org/sites/default/files/california-drought-desalination-2-ib.pdf>

⁸⁷ ST. WATER RESOURCES CONTROL BOARD, DESALINATION FACILITIES AND BRINE DISPOSAL, https://www.waterboards.ca.gov/water_issues/programs/ocean/desalination/ (last visited April 23, 2018).

⁸⁸ See DEIR Appendix 2A. “Feasibility Assessment of Subsurface Seawater Intakes Proposed”, Appendix 2B. “Seabed Infiltration Gallery Construction and Life-Cycle Costs”, and Appendix 10. Ocean Plan Amendment Siting and Intake and Discharge Method Considerations”.

⁸⁹ CEQA Guidelines §15021(a)(2)

⁹⁰ Desal Amdt Final Staff Report at 76.

⁹¹ California Water Boards, “Ocean Standards – § 316(b) Regulation” https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/

Comment Letter HERMOSA BEACH



The DEIR has made the unreasonable conclusion that, in a number of key instances, because the impacts of the 20 MGD Local Project are less than significant, the impacts of a 60 MGD Regional Project would also be less than significant. For example, in evaluating the water quality impacts of the Regional Project, the DEIR states:

As with the Local Project, the brine discharge would not contribute contaminants or increase their concentration significantly over ambient levels beyond the mixing area ... Therefore, impacts [of the Regional Project] to ocean water quality would be less than significant.⁹²

It is unreasonable to assume that the impacts of the Local Project can be extrapolated to the Regional Project on a linear basis. Particularly in the presence of other cumulative sources of marine pollution, such as those discussed in Section I.D, the withdrawal of three-times more seawater or discharge of this larger volume of brine effluent may have a greater than three-times the impacts. Even if a conclusion of less than significant impact for the Local Project is correct, this finding cannot be applied without the conduct of fresh analysis to a project three-times the size. At a minimum, the DEIR fails to account for one-to-one increase in impacts; more likely, it has failed to acknowledge that the impacts are likely to be multiplied, potentially exponentially.

HBCH-34

The DEIR has attempted to establish that nearly all assessments of impacts at the 20 MGD Local Project level should apply to projects at the 60 MGD Regional level, essentially asserting that the Regional Project should be allowed to tier off the Local Project. CEQA allows for tiering of environmental impact reports when the first EIR is prepared at the larger, more general level, "prepared and certified for a program, plan, policy, or ordinance".⁹³ The DEIR has taken the opposite approach: it asserts that a more narrow project could be used to tier approval of a project three times the size. If the 60 MGD project is the actual goal of this development, all assessment of impacts should be based on thorough evaluation of the impacts of a project of that size.

VII. Conclusion: The Project should be re-evaluated and if pursued, the DEIR should be revised and re-circulated.

West Basin has prepared a lengthy DEIR, but it suffers from information gaps, flawed analysis, and erroneous conclusions. The DEIR has failed to account for a number of the Project's anticipated significant impacts, particularly to the marine environment, energy and greenhouse gas emissions, public safety sea level rise and coastal hazard preparedness. The DIER has also failed to propose mitigation measures that could adequately address these significant impacts.

HBCH-35

The flaws in the DEIR reflect the fact that the Project itself is ill conceived. We strongly urge West Basin to abandon this Project and focus on other less costly and less impactful water supply options, including water recycling, and groundwater recharge that are within its purview. To the extent that seawater desalination will be pursued, we encourage West Basin to reconfigure the Project so that it is located in an area less vulnerable to sea level rise and coastal hazards; utilizes subsurface intakes and other best available technology to minimize marine impacts; operates entirely on renewable energy; and is scaled-down to allow for flexible operations, tailored to meet demand.

Sincerely,

**John Jalili,
Interim City Manager**

⁹² DEIR at 5.9-60.

⁹³ CEQA § 21094(a)(1); CEQA Guidelines § 15152.

June 25, 2018

Sent via email to DesalEIR@westbasin.org

Zita Yu, Ph.D., P.E
Project Manager
West Basin Municipal Water District
17140 South Avalon Boulevard, Suite 210
Carson, CA 90745

RE: West Basin’s Ocean Water Desalination Project DEIR – City of Malibu Comments

Dear Dr. Yu:

This letter is submitted on behalf of the City of Malibu in response to the Draft Environmental Impact Report (DEIR) for the West Basin Municipal Water District Ocean Water Desalination Project (Project).

The cost of water produced by seawater desalination is four to eight times higher than alternative sources of water, ranging from \$1,900 to over \$3,000 per acre foot.¹ The City is concerned that there is significant “demand risk” presented by this Project (the City’s water demand can be met by less expensive sources of water), and there is risk that this Project will create an unnecessary financial burden for rate payers and municipalities.² The financial risk of this Project is illustrated by Australia’s experience building six large-scale seawater desalination plants at a cost of \$10 billion.³ These plants were abandoned or operate at reduced capacity, in favor of efficiency and other more cost-effective water supply alternatives.

MLBU-1

The City of Malibu strongly prefers to focus its water supply portfolio on readily available, lower-cost and lower-impact alternatives, including water conservation, water efficiency, stormwater capture, and water recycling, and suggests that West Basin pursue water supply options other than seawater desalination. For example, the Water Replenishment District of Southern California expects that it can supply 57,770 AFY of additional groundwater production to offset imported water demands with stormwater, tertiary recycled water and advanced treatment recycled water.⁴

MLBU-2

¹ NRDC et al. PROCEED WITH CAUTION II: CALIFORNIA’S DROUGHTS AND DESALINATION IN CONTEXT, (2016), <https://www.nrdc.org/sites/default/files/california-drought-desalination-2-ib.pdf>

² NRDC et al. PROCEED WITH CAUTION II AT 7

³ Id.

⁴ CH2M HILL, ENGINEERS, INC. GROUNDWATER BASINS MASTER PLAN, FINAL REPORT, Water Replenishment District of Southern California (2016) http://www.wrd.org/sites/pr/files/GBMP_FinalReport_Text%20and%20Appendicies.pdf

In addition to perspectives that pursuing seawater desalination is neither necessary nor appropriate, City staff has specific concerns with the Project and the review of the Project’s environmental impacts in the DEIR, including the following:

1. The environmental review fails to present substantial evidence that marine biological and water quality impacts are less than significant or can be mitigated.
2. The Project is likely to have significant energy impacts.
3. The Project is unjustified in taking credit for speculative greenhouse gas reductions
4. The DEIR fails to account for the significant impacts of developing a new water source at a vulnerable beach location.
5. The DEIR’s alternatives analysis fails to address significant environmental impacts.
6. Mitigation proposed for significant marine biological, water quality, energy, greenhouse gas, coastal hazard and cumulative impacts is speculative.
7. The analysis of the Regional Project of 60 MGD is insufficient as it attempts to tier off the impact assessment of the Local Project of 20 MGD.

MLBU-3

1. The Project DEIR fails to present substantial evidence that marine biological and water quality impacts are less than significant or can be mitigated.

- A. *The DEIR has designated a limited marine study area, which excludes consideration of significant environmental impacts of the Project to marine biology and water quality in Santa Monica Bay (SMB).*

Under California law, West Basin must analyze whether the Project will have a significant effect on the environment, which is the extent to which it will cause “substantial adverse change in the physical conditions which exist in the area affected by the proposed project.”⁵ In conducting this analysis, the DEIR is required to include a description of the environmental setting of the project, which is “... the physical environmental conditions in the vicinity of the project ... This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”⁶

MLBU-4

West Basin acknowledged that SMB is the environmental setting in which the Project will occur.⁷ However, in DEIR Section 5.9.2 “Study Area,” the “marine study area” is described as:

⁵ CEQA Guidelines § 15002 (g).

⁶ CEQA Guidelines § 15125 (a).

⁷ DEIR at 5.11-10.

A 2-mile by 1.5-mile area of marine waters and seafloor extending 1.5 miles offshore and 1 mile up-coast and down-coast of the proposed desalination discharge and seawater intake facilities.⁸

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MLBU-4

Throughout the document, the DEIR acknowledges that there are habitat and species of concern within SMB, but the review discounts the likely impacts of the Project on these resources by assessing only the extent to which they are present in the much more geographically-limited marine study area. The DEIR states that:

Based on the absence of suitable habitat in the Project marine study area, the absence of substantial larval densities of special-status species in the Project marine study area, and the natural life history of special-status species of concern present in the Project marine study area, the potential for entrainment of these special-status species is negligible to non-existent. Therefore, the impact would be less than significant.⁹

MLBU-5

This approach fails to consider the many studies establishing that the habitats and biological communities of the entire SMB are connected by a complex system of currents, the movement of marine life, and an array of anthropogenic impacts in this highly developed region. For example, in SMB:

Many nearshore fish and invertebrates have a life cycle that includes an obligate pelagic larval stage that can last from a few days to several months. Due to the small size of marine larvae, advection by coastal circulations is the dominant process driving larval dispersal which will have an order one influence on their fish stock dynamics.¹⁰

Study of connectivity in the Southern California Bight has found significant transport of water between mainland sites in SMB and the Channel Islands. “Effective marine management depends upon an explicit knowledge of dispersal as a result of ocean circulation.”¹¹ It is essential for the DEIR to account for the fact that ocean circulation can cause both the dispersal of marine species larvae, which could cause far greater impacts than are acknowledged in the DEIR, including impacts to larvae, and dispersal of the brine and pollutants released as a bi-product of desalination.

⁸ DEIR at 5.9-25. However, Section 5.11.2 describes the marine study area slightly differently, using nautical miles: “an area extending approximately 1 nautical mile upcoast and downcoast of the terminus points of the ESGS intake and outfall pipelines and situated parallel to the shoreline and extending approximately 1.5 nautical miles offshore from the beach, ending in approximately 90 feet of water,” DEIR at 5.11-10.

⁹ DEIR at 511-54.

¹⁰ S. Mitarai et al., *Quantifying connectivity in the coastal ocean with application to the Southern California Bight* 114 J. OF GEOPHYSICAL RES. C10026, (2009), <https://doi.org/10.1029/2008JC005166>
<https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1029/2008JC005166>.

¹¹ S. Mitarai et al., *Quantifying connectivity in the coastal ocean with application to the Southern California Bight* 114 J. OF GEOPHYSICAL RES. C10026, (2009), <https://doi.org/10.1029/2008JC005166>
<https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1029/2008JC005166>.

Currents and ocean circulation patterns are likely to disperse the pollutants released by the Project far beyond the marine study area. The Project could therefore cause significant water quality impacts on a much broader area of the SMB than acknowledged by the DEIR.¹² The DEIR has not incorporated substantial evidence readily available, which indicates that the impacts of increased salinity and lowered dissolved oxygen from brine discharges, and release of other contaminants from the Project operations could be significant and reach far beyond the marine study area.¹³

MLBU-6

At a minimum, SMB as a whole, rather than the DEIR’s limited marine study area, should be the area evaluated for impacts caused by the Project.

MLBU-7

B. The DEIR has not accounted for potential impacts to significant ecological areas, particularly marine protected areas (MPA).

The DEIR acknowledges the presence of significant ecological areas in SMB, including the Mugu Lagoon to Latigo Point Area of Biological Significance (ASBS) 18 miles northwest of the Project area, the Point Dume State Marine Conservation Area (SMCA) and State Marine Reserve (SMR) 22 miles northwest of the Project area, and the Palos Verdes SMCA and SMR seven miles south of the Project area.¹⁴ However, the DEIR has not evaluated the impacts the Project may have on the health and biological function of these MPA, and the DEIR lacks evidence to establish that the MPA’s distance is far enough from the Project that it will not have significant negative impacts on these areas.

MLBU-8

Under the Marine Life Protection Act, California created a world-class network of MPA that were carefully designed, with extensive expert input, to support connectivity between the areas. While the Project is not located within a protected area, it is located between the Point Dume and Palos Verdes MPAs, between which marine life is expected to transit and have the potential to be impacted by the Project along the way.

[M]ost marine invertebrates and fishes produce young (eggs, larvae) that are typically dispersed by ocean currents over great distances (10's to 100's of kilometers). Thus much of the population connectivity achieved by marine species is by the transport of their young from one population to another in spatially separated similar habitats ... This export of individuals from one local population to another, which may be protected by one or more MPAs, influences both the role of MPAs for conservation and

¹² S. Mitarai et al., *Quantifying connectivity in the coastal ocean with application to the Southern California Bight* 114 J. OF GEOPHYSICAL RES. C10026, (2009), <https://doi.org/10.1029/2008JC005166>
<https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1029/2008JC005166>.

¹³ E.g. DEIR at 5-11-58.

¹⁴ DEIR at 5.11-34 to 5.11-36.

management and the design (e.g. size and spacing) of MPAs. These elements of population connectivity are critically important to MPAs and MPA networks.¹⁵

As described above, the assessment of the Project’s marine and water quality impacts is based on a small rectangle within SMB. The entire SMB is the appropriate “marine study area,” and City staff would like to see assessments of impacts in the DEIR to account for the movement of water and marine life throughout that body of water and the associated impact on the MPAs bordering SMB.

MLBU-8

C. *The Southern California Bight is the appropriate area for consideration of regional impacts of the Project.*

Assessment of the Project’s impacts to the marine environment of SMB is the minimum spatial scale that is reasonable, given the circulation patterns and interconnectivity of the broader marine region known as the Southern California Bight (SCB), in which SMB is situated. CEQA requires that significant environmental impacts be considered in the “full environmental context.”

MLBU-9

Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.¹⁶

The SCB is “the coastal ocean from Point Conception to just south of San Diego and inshore of the Santa Rosa Ridge.”¹⁷ While the DEIR acknowledges that the Project is located in this region and that there are multiple seawater desalination facilities within the SCB,¹⁸ the DEIR fails to consider the features and functions of this marine eco-region when assessing the Project impacts on marine biological resources and water quality impacts. For example, the SCB is characterized by circulation patterns that are more complex than elsewhere off the west coast.¹⁹ Furthermore, as discussed in the following section, the

¹⁵ M. Carr et al., *The central importance of ecological spatial connectivity to effective coastal marine protected areas and to meeting the challenges of climate change in the marine environment*, 27 *AQUATIC CONSERVATION* S1, (2017), <https://onlinelibrary.wiley.com/doi/abs/10.1002/aqc.2800>

¹⁶ CEQA Guidelines § 15125 (c).

¹⁷ *CIRCULATION IN THE SOUTHERN CALIFORNIA BIGHT*, <https://web.csulb.edu/depts/geology/facultypages/bperry/Southern%20California%20Bight/pollution.htm> (last visited April 22, 2018).

¹⁸ DEIR at 4-12.

¹⁹ *CIRCULATION IN THE SOUTHERN CALIFORNIA BIGHT*, <https://web.csulb.edu/depts/geology/facultypages/bperry/Southern%20California%20Bight/pollution.htm> (last visited April 22, 2018).

DEIR acknowledges that the SCB is the relevant geographic range for which to consider significant and cumulative marine impacts.²⁰

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MLBU-9

D. Evaluation of only a narrow set of cumulative marine impacts undermines the DEIR’s cumulative impact assessment.

The DEIR acknowledges CEQA’s requirement that, because the Project has “an incremental effect that is “cumulatively considerable,”²¹ it is necessary to address “past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the Agency.”²² However, the cumulative assessment of impacts to the marine environment is limited to a brief acknowledgement of only twelve projects.²³ The cumulative impact assessment omits consideration of the vast number of anthropogenic activities “producing related or cumulative impacts” to marine life in the Santa Monica Bay and the Southern California Bight.

The SCB is a highly-developed area that is impacted by a wide array of activities. Just as species transit between habitats throughout SMB and the SCB, pollutants and negative impacts are also transported between ecosystems, and this transport and accumulation of pollutants can negatively impact MPAs:

MLBU-10

[S]ome forms of ecosystem connectivity can be detrimental to both recipient and donor ecosystems ... impacts to donor ecosystems that create inhospitable conditions can drive populations from those ecosystems, altering their structure and functions and diminishing their productivity. These impacts can be transmitted from one ecosystem to another by altering ecosystem functions ... The cumulative and distributed negative effects of ecosystem connectivity can translate into lost ecosystem services ...²⁴

The cumulative impact assessment should evaluate the harm to marine life caused by a much wider range of anthropogenic activities in the SCB with effects similar to those anticipated from the Project. As discussed in the comment letter submitted by Heal the Bay, incorporated herein by reference, impacts that should be considered in the cumulative impact assessment include, but are not limited to all relevant point- and non-point sources of pollution in the SCB and noise impacts to marine life.

²⁰ DEIR at 4-3.

²¹ CEQA Guidelines § 15130 (a).

²² CEQA Guidelines § 15130 (b).

²³ DEIR at 4-3, 4-11, 4-12.

²⁴ M. Carr et al., *The central importance of ecological spatial connectivity to effective coastal marine protected areas and to meeting the challenges of climate change in the marine environment*, 27 *AQUATIC CONSERVATION* S1, (2017), <https://onlinelibrary.wiley.com/doi/abs/10.1002/aqc.2800>

E. The objective of the California Ocean Plan Desalination Amendment should be included as a key threshold of significance for water quality and marine biological impacts.

The DEIR applies general CEQA Guidelines thresholds of significance in evaluating the water quality (Sec. 5.9.3) and marine biological (Sec. 5.11.3) impacts of the Project. However, the CEQA Handbook indicates that where specific regulations particular to the environmental effect in question are available, those should be used as the appropriate threshold of significance.²⁵

The California Ocean Plan Desalination Amendment (Desal Amendment) is the regulatory framework adopted specifically to address the water quality and marine biological effects of seawater desalination facilities. The Desal Amendment was adopted by the State Water Resources Control Board (SWRCB) after publication of substantial evidence, including scientific studies and public input, which is available in the staff record.²⁶ The Desal Amendment requires that desalination projects use best available site, design, and technology to “minimize intakes and mortality to all forms of life.”²⁷ The Desal Amendment was adopted to address the fact that seawater desalination projects are known to have significant, long-term environmental effects. The Desal Amendment’s requirement that projects “minimize intakes and mortality to all forms of life” should, therefore, be incorporated into the DEIR, rather than the more permissive, general thresholds of the CEQA Guidelines.

While the DEIR acknowledges that the Desal Amendment is salient to the threshold of significant, stating that this regulation was “considered,” the thresholds of significance used do not reflect the key metric applied in the Desal Amendment.²⁸ When assessing water quality and marine biological impacts, the extent to which the Project will “minimize intakes and mortality to all forms of life” should be added and applied as a threshold of significance in the DEIR.

F. Potentially significant marine biological and water quality impacts have not been evaluated or addressed.

Although the requirements of the Desalination Amendment were not used as thresholds of significance, West Basin acknowledges that this is the regulatory standard with which the site, design and technology of the Project must comply. While compliance with the Desal Amendment is necessary, compliance with its guidance alone does not guarantee that the Project will not have significant environmental impacts. A 2016 convening of experts at

MLBU-11

MLBU-12

²⁵ CEQA Guidelines § 15064.7 (a).

²⁶ See, ST. WATER RESOURCES CONTROL BOARD, FINAL STAFF REPORT INCLUDING THE FINAL SUBSTITUTE ENVIRONMENTAL DOCUMENTATION FOR THE AMENDMENT TO THE WATER QUALITY CONTROL PLAN FOR THE WATERS OF CALIFORNIA, ADDRESSING DESALINATION FACILITY INTAKES, BRINE DISCHARGES, AND THE INCORPORATION OF OTHER NON-SUBSTANTIVE CHANGES, Adopted May 6, 2015, (hereinafter “Final Staff Report for Desal Amendment”), https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/rs2015_0033_sr_apx.pdf

²⁷ California Ocean Plan, Desalination Amendment, Chapter III.M.2.a.(2).

²⁸ DEIR 5.11-36.

Stanford University concluded that, despite the promulgation of the Desal Amendment, “[m]ore work is needed to understand the long-term impacts of [desalination] discharges.”²⁹ The requirements of the Desal Amendment are merely a starting point for best available site, design and technology. Approaches that are “best available” are, by definition, progressively evolving as new studies are conducted, lessons are learned, and technologies are tested and advanced.

The impacts of large-scale seawater desalination are not well documented or understood, and it is difficult to accurately predict how the Project will impact the specific environment of SMB. As discussed below, although the DEIR acknowledges that there are substantial gaps in information available to assess the actual impact of the Project’s planned technology, the document repeatedly concludes that the impacts will not be significant. There are also significant gaps in information that are not acknowledged by the DEIR. Because of these data gaps, it is unreasonable for the DEIR to make an unfounded leap in analysis to conclude that water quality and marine biological impacts will be less than significant.

1. Impacts of wedgewire screen intakes are uncertain and may be significant, the DEIR should not rely on speculative future mitigation.

The 20 MGD Local Project is planned to withdraw between 42 to 45 MGD of source seawater;³⁰ the 60 MGD Regional Project would require between 126.6 -136.2 MGD of source seawater.³¹ The Desal Amendment to the Ocean Plan requires that if the preferred subsurface intakes are not feasible, then surface water intakes with 1.0 mm or smaller slot size may be utilized.³² West Basin proposes to use “screened ocean intake system with 1 mm open passive wedgewire screens and operating intake flow at < 0.5 fps.”³³ However, the DEIR states:

[t]o date, there have not been any scientific studies designed or conducted to systematically evaluate wedgewire screens’ performance in the absence of any appropriate sampling protocols developed to allow for proper assessment.³⁴

This acknowledged lack of information calls into question the effectiveness of wedgewire screens to minimize marine life impacts.

West Basin hired consultants to conduct the *Intake Effects Assessment Report* (Tenora 2014), which examined the impacts of a demonstration facility with a maximum daily

MLBU-12

²⁹ MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA at 5

³⁰ DEIR at 3-4.

³¹ DEIR at 3-16.

³² California Ocean Plan, Desalination Amendment, Chapter III.M.2.d.(1)(c)(ii).

³³ DEIR at 5.11-49.

³⁴ DEIR at 5.11-52.

intake of 0.511 MGD, then used this assessment to model the impacts of a 20 MGD plant.³⁵ The 20 MGD Local Project would intake 45.4 MGD of seawater,³⁶ an intake 89 times greater than the demonstration facility, while the 60 MGD Regional Project would utilize up to 136.2 MGD,³⁷ an intake 266.5 times greater than the demonstration facility. The DEIR states that modeling based on the demonstration facility finds no significant impact for the Local Project. The Regional Project has apparently not been modeled, but the impacts are dismissed as less than significant. It is an unreasonable leap in analysis to assume that the results of a small-scale modeling exercise can be extrapolated to the far larger intake volume, using untested intake technology.

MLBU-12

The DEIR acknowledges data gaps and uncertainty in assessing the impacts of the intake: “At present, the extent of protection that wedgewire screens could provide to prevent entrainment of larval fish and invertebrates in the Project marine study area is unknown.”³⁸ The DEIR then defaults to reliance on mitigation for whatever impacts may, in fact, result. The mitigation proposed, “BIO-M2,” is essentially compliance with Water Code Section 13142.5(b) and the Ocean Plan Desal Amendment. This mitigation program will be based on future study of impacts and is speculative at this time.³⁹

MLBU-13

2. Brine impacts are likely to be significant; important information has been ignored or dismissed.

West Basin states that they will be unable to comingle brine with wastewater, which is the “preferred technology for minimizing intake and mortality to all forms of life resulting from brine,”⁴⁰ because sufficient supplies of wastewater will purportedly not be available. Instead, the Project will utilize multiport diffusers, which is the Desal Amendment’s “next best method for disposing of brine when the brine cannot be diluted by wastewater.”⁴¹ The DEIR notes that 25.4 MGD of brine will be discharged for the 20 MGD Project;⁴² and 76.2 MGD will be discharged for a 60 MGD Regional Project, although that discharge could peak at 83 to 95 MGD.⁴³

MLBU-14

³⁵ DEIR at 2-33, 5.11-52.

³⁶ DEIR at 3-12.

³⁷ DEIR at 3-16.

³⁸ DEIR at 5.11-53.

³⁹ “The primary adverse effect of screened open ocean intakes is mortality of larval fish, fish eggs and other types of plankton. This mortality can be assessed, but prediction of the overall impact from such mortality using traditional models is hindered by the paucity of information on typical survivorship to maturity for most species. As a result, the overall impact of intake mortality on the marine ecosystem cannot always be quantified reliably.” WATER IN THE WEST, ET AL., MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA, Stanford University, at 4 (2016), http://waterinthewest.stanford.edu/sites/default/files/Desal_Whitepaper_FINAL.pdf.

⁴⁰ California Ocean Plan, Desalination Amendment, Chapter III.M.2.d.(2)(b).

⁴¹ California Ocean Plan, Desalination Amendment, Chapter III.M.2.d.(2)(b).

⁴² DEIR at 3-13.

⁴³ DEIR at 3-17.

The CEQA Guidelines require that sufficient technical detail be provided to “permit full assessment of significant environmental impacts” of a project.⁴⁴ This Project is highly technical, and modification of the intake or outflow technology can have important implications for the significance of environmental impacts. The DEIR is therefore flawed for failing to finalize and analyze the specific brine dispersal technology that will be utilized.

MLBU-14

There are also substantial omissions in the DEIR’s analysis of known impacts of brine disposal. The DEIR fails to acknowledge that potential impacts of brine effluent discharges are poorly understood. For example, desalination brine has been shown to “impact the physiology and growth of seagrass meadows due to osmotic stress around the brine-effluent discharge point”⁴⁵, yet the DEIR does not evaluate the potential impact on seagrass, including important eelgrass beds near the proposed Project.⁴⁶ The water temperature of desalination brine effluent can also be elevated by up to 25% over ambient water temperature.⁴⁷ Despite acknowledgement of regulatory requirements related to thermal impacts, the DEIR fails to analyze the Project’s potential thermal impacts.⁴⁸

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A 2018 review of the latest available information states that “to date, the effects of brine-effluent discharge on coastal marine ecosystems are poorly understood, [sic] thereby merit further research via controlled bioassay experiments and more importantly long-term monitoring”.⁴⁹ For example, the impacts of desalination brine on the zooplankton food web, benthic bacteria, benthic meiofauna (e.g. bioindicator species that are highly sensitive to anthropogenic effects such as nematodes) are largely unknown.⁵⁰

MLBU-17

While the use of multiport diffusers has been shown to reduce some of the impacts of brine effluent, experts differ on the efficacy of this technology to reduce marine life mortality, particularly given the tradeoffs between dilution and shear mortality caused by the jet force of the diffusers.⁵¹ To adequately assess the impacts of the Project’s brine on the marine environment, it is essential to both determine which diffuser configuration is going to be used, and to test the impacts of that specific technology.

⁴⁴ CEQA Guidelines § 15147.

⁴⁵ “Impacts of Seawater Desalination on Coastal Environments,” at 448.

⁴⁶ See, e.g. Brock Bernstein et al. RECOMMENDATIONS FOR A SOUTHERN CALIFORNIA REGIONAL EELGRASS MONITORING PROGRAM, Technical Report 632, May 2011, Southern California Coastal Water Research Project, at 10 http://www.westcoast.fisheries.noaa.gov/publications/habitat/california_eelgrass_mitigation/recommendations_for_monitoring_1_.pdf.

⁴⁷ “Impacts of Seawater Desalination on Coastal Environments,” at 454.

⁴⁸ DEIR at 5.9-20, 5.9-32, 5.11-4.

⁴⁹ Karen L. Petersen et al. SUSTAINABLE DESALINATION HANDBOOK, Chapter 11, “Impacts of Seawater Desalination on Coastal Environments,” at 440, available at <https://www.sciencedirect.com/science/article/pii/B9780128092408000113>

⁵⁰ “Impacts of Seawater Desalination on Coastal Environments,” at 442-445.

⁵¹ Philip J.W. Roberts, Brine Diffusers and Shear Mortality, Final Report for Eastern Research Group, https://www.waterboards.ca.gov/santaana/water_issues/programs/Wastewater/Poseidon/2018/4-18-

Furthermore, the DEIR must acknowledge and address the significant gaps in analysis of the impacts of the brine effluent.

MLBU-17

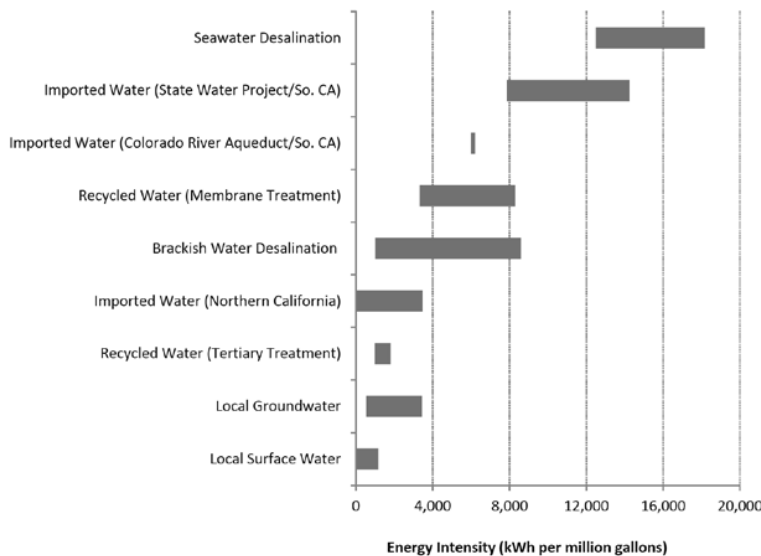
2. The Project is likely to have significant energy impacts; the Project should be reevaluated and the DEIR revised in light of these energy impacts.

A. Analysis of energy efficiency and waste is insufficient.

In assessing energy impacts of the Project, the DEIR acknowledges the applicability of CEQA Guidelines Appendix F, which directs EIRs to place “particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.”⁵² However, aspects of the analysis are inconsistent with this directive, and the DEIR downplays the extent to which seawater desalination is the most energy intensive source of water.

MLBU-18

The DEIR assesses the Project’s energy use only in comparison to imported water, rather than comparing the energy use of seawater desalination to the even less energy intensive options. The Project is purportedly justified by the need for a diversified water supply, but diversification can still be accomplished without the use of this large-scale desalination plant. The DEIR should demonstrate how much energy seawater desalination uses in comparison to the range of other water supply alternatives, and not only compare the energy impacts of the Project to imported water.



MLBU-19

Figure 1. Comparison of the Energy Intensity of California Water Supplies⁵³

⁵² DEIR at 5.5-9,-10.

⁵³ Heather Cooley, *Key Issues in Seawater Desalination in California: Energy and Greenhouse Gas Emissions*, Pacific Institute at 7 (2013), <http://pacinst.org/publication/energy-and-greenhouse-gas-emissions-of-seawater-desalination-in-california/>

The DEIR does not reference the preeminent analysis conducted by the Pacific Institute comparing the energy and GHG emissions of seawater desalination to other water supply options.⁵⁴ This is an important example of significant gaps in evidence utilized by the DEIR in conducting its analysis.

MLBU-19

In consideration of these issues with the DEIR, it appears that the Project would have significant, unavoidable energy impacts. City staff suggests that West Basin re-evaluate the energy impacts of the Project with these points in mind.

MLBU-20

B. The DEIR does not account for impacts that could undermine grid reliability and SCE’s compliance with the RPS.

The DEIR has concluded that the Project will have less than significant impacts to adopted energy conservation plans or to state or federal energy standards.⁵⁵ This analysis appears to be deficient because it does not fully account for the additional and unplanned load that the project will place on the electrically constrained Southern California Edison (SCE) service area. As the DEIR notes, SCE is transitioning to increased renewable energy production in compliance with the RPS. However, the addition of this new project could actually jeopardize the attainment of RPS goals.

MLBU-21

SCE has added more than 5,000 MW of new generation resources in coastal areas to account for the retirement of old power plants.⁵⁶ However, that addition of new generation was based on projected energy needs that did not include this Project. The energy consumption of this plant could surpass the amount saved by the new energy efficiency programs, while also placing a peak demand on the system. SCE and the California Public Utilities Commission (CPUC) should be consulted, a third party assessment of the Project’s impacts on energy conservation plans and state and federal energy standards should be conducted, and that assessment be incorporated into a revised and recirculated EIR.

3. The Project erroneously takes credit for GHG reductions related to the offset of imported water, yet there is no guarantee that the project will result in such offset.

MLBU-22

The DEIR asserts that the Project – whether developed to the Local or Regional size – would “ensure that there would be no net increase in GHG emissions compared to existing conditions associated with water supplied by MWD,” specifically, imported water, and thus would not represent a significant or cumulative contribution to GHG emissions.⁵⁷ Seawater desalination

⁵⁴ See, Heather Cooley, *Key Issues in Seawater Desalination in California: Energy and Greenhouse Gas Emissions*, Pacific Institute (2013), <http://pacinst.org/publication/energy-and-greenhouse-gas-emissions-of-seawater-desalination-in-california/>

⁵⁵ DEIR at 5.5-14 to 5.5-18.

⁵⁶ NRDC et al. PROCEED WITH CAUTION II: CALIFORNIA’S DROUGHTS AND DESALINATION IN CONTEXT, (2016), <https://www.nrdc.org/sites/default/files/california-drought-desalination-2-ib.pdf>

⁵⁷ DEIR at 5.7-38.

is one of the most energy-intensive water options available, and the conclusion that it will not result in significant GHG emissions is unsubstantiated.

The DEIR compares GHG emission of desalination only to the emissions caused by imported water supplied by MWD. Instead, as discussed above, the energy and emissions impacts of the Project should be compared to the range of other water supply options, which use far less energy. The DEIR relies heavily on the assumption that desalinated water will replace imported water, arguing that the significant impacts of the West Basin Project can be justified compared to the impacts of imported water. This argument fails because experts agree that:

Ocean desalination will not, in the foreseeable future, significantly reduce stress on freshwater resources—particularly freshwater ecosystems. Even the highest total projected production of potable water from ocean desalination in California is so low that it will not meaningfully reduce stress on freshwater systems⁵⁸

The DEIR also implies that there will be a one-for-one replacement of imported water by MWD, asserting that the Project will “reduce dependency on imported water and would not result in a new increase in West Basin’s total water supply portfolio.”⁵⁹ This claimed benefit is illusory; it is not a guaranteed outcome, because West Basin does not exercise control over the multiple sources from which its retailers purchase water. The California Coastal Commission rejected a similar argument by Poseidon water in Carlsbad, because without a contractual obligation, the new desalinated water could simply meet new increased demand, rather than replacing imported water.

Finally, the DEIR asserts that the Project will offset the increased energy and emissions impacts of the Project by using renewable energy, where possible. This approach ignores the superior alternative of using renewable energy to offset the GHG emissions of a less energy-intensive water source, rather than offsetting new emissions and thereby maintaining current GHG levels.⁶⁰

4. Developing a new water source at a vulnerable beach location unreasonably disregards state policy and best practices to address public safety, disaster preparedness, climate change and sea level rise.

A. The Project has failed to account for sea level rise and climate change impacts.

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MLBU-26



⁵⁸ Leon Szeptycki, et al., MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA, Water in the West, Center for Ocean Solutions, Monterey Bay Aquarium, The Nature Conservancy, (2016), available at <http://stanford.io/2axdXE7>.

⁵⁹ DEIR at 5.7-37.

⁶⁰ See, Heather Cooley, *Key Issues in Seawater Desalination in California: Energy and Greenhouse Gas Emissions*, Pacific Institute (2013), <http://pacinst.org/publication/energy-and-greenhouse-gas-emissions-of-seawater-desalination-in-california/>

West Basin’s Project would require massive investment in new infrastructure a few feet above sea level. The DEIR’s assessment of sea level rise concludes that “portions of the ESGS Site would be vulnerable to flooding from future coastal flood hazards, including from strong wave surge and tsunami inundation under future sea-level flood hazard conditions.”⁶¹ The DEIR acknowledges that “operation of the Project on either the ESGS North Site or South Site would result in potentially exposing people or structures to risk of loss, injury or death ... due to sea-level rise.”⁶² The DEIR claims that the impacts would be less than significant with mitigation, but what this mitigation would entail is to be determined by future study and recommendations.⁶³ In their comment letter, incorporated herein by reference, Heal the Bay has further described the geologic instability and dangers, which have not been adequately addressed in the DEIR.

As the DEIR acknowledges, the Project is subject to provisions of the Coastal Act, because it is located in the Coastal Zone, and it is a “coastal-dependent” use and a “public works” project that would involve production, storage, and transport of water.⁶⁴ While the grant of a Coastal Development Permit and the final determination on Coastal Act consistency will be made by the City of El Segundo and the California Coastal Commission, the DEIR has failed to address critically important risks related to the Project’s location, which is vulnerable to erosion, flooding, earthquakes and sea level rise.⁶⁵ Where there is an opportunity, as in this case, to choose the location of new public infrastructure, it should be located away from vulnerable areas. While the DEIR acknowledges the applicability of the Coastal Commission’s Sea Level Rise Policy Guidance, the analysis is flawed and unreasonable in concluding that there are no significant impacts resulting from the conflict between the Policy and the Project.⁶⁶ The Project has disregarded the Sea Level Rise Policy Guidance; it should be re-evaluated in light of recommendations, for example, to “relocate or remove existing development out of hazard areas and limit the construction of new development in vulnerable areas.”⁶⁷

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5. The alternatives analysis has inappropriately eliminated feasible alternatives based on arbitrary criteria. The analysis should be revised to more broadly consider alternative water supply options, as well as site, design and technology required by the California Ocean Plan.

MLBU-27

A. Alternatives analysis omits consideration of significant impacts.

⁶¹ DEIR 5.9-75. *See also*, Appendix 5B. Technical Memorandum: Coastal Hazards Analysis of the West Basin Municipal Water District Ocean Water Desalination Project for Sea Levels at Year 2100.

⁶² DEIR 5.9 -76.

⁶³ DEIR 1-21.

⁶⁴ DEIR at 5.10-16.

⁶⁵ http://www.pacinst.org/reports/sea_level_rise/hazmaps/Venice.pdf

⁶⁶ DEIR at 5.10-16.

⁶⁷ SEA LEVEL RISE POLICY GUIDANCE, Chapter 7: “Adaptation Strategies” at 125.

West Basin asserts that construction-related air quality and noise impacts are the only significant and unavoidable impacts for which alternatives must be considered.⁶⁸ In analyzing project alternatives, West Basin’s analysis is deficient in that it fails to consider the additional significant impacts described above, for which there are reasonable alternatives that could eliminate the impacts, such as those alternatives discussed in Los Angeles Waterkeeper’s comment letter, incorporated herein by reference. In particular, West Basin has not accounted for the significant unavoidable impacts to marine biological resources, water quality, energy, greenhouse gas emissions and climate change dynamics. Those impacts were incorrectly dismissed as less than significant, or the acknowledged significant impacts were dismissed with general claims that future mitigation will address their impacts. The alternatives analysis fails to give sufficient consideration to alternatives that reduce a number of significant impacts. By failing to consider alternatives that address those impacts, West Basin has not made a “reasoned choice” of alternatives as required by CEQA.⁶⁹

MLBU-27

B. The DIR’s alternatives analysis uses narrow screening criteria to unreasonably remove feasible alternatives from consideration.

The analysis of the feasibility of a project alternative should be based upon consideration of:

“...site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).”⁷⁰

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Rather than assessing the broader set of alternatives against these characteristics of feasibility outlined in the CEQA Handbook and the Project objectives, West Basin has applied a set of narrowly drawn “screening criteria” to justify elimination of reasonable, feasible alternatives from consideration.⁷¹ The initial screening of alternatives was arbitrarily narrow in requiring that precisely 21,500 AFY average annual additional water supply be generated, as is discussed in Los Angeles Waterkeeper’s comment letter and incorporated by reference herein.⁷²

Among the alternatives that could reduce environmental impacts and meet basic project objectives, the DEIR has failed to consider a blend of those water supply options, such as increased conservation, stormwater capture and increased non-potable recycling.⁷³ West

⁶⁸ DEIR at 7-3 to 7-4.

⁶⁹ CEQA Guidelines § 15126.6(f).

⁷⁰ CEQA Guidelines §15126.6(f)(1).

⁷¹ DEIR at 7-5.

⁷² DEIR at 7-6.

⁷³ DEIR at 7-8.

Basin should also consider the possibility of a smaller project that would be capable of utilizing subsurface intakes and powered by renewable energy.⁷⁴

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C. The alternative analysis includes unsupported assertions that cost and economic considerations make less impactful alternatives infeasible.

Among the Project’s stated objectives are to “[i]mprove West Basin’s local control of future water costs and long-term price stability”, and to “[d]evelop a potable water supply that is economically viable”. These objectives are suspect, as CEQA guidance instructs project proponents to consider alternatives that avoid or substantially lessen significant effects even if those alternatives would be more costly.⁷⁵ To the extent that consideration of the alternatives’ costs is permissible, West Basin has failed to “include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison to the proposed project.”⁷⁶

The DEIR provides only vague statements, and no quantitative information, about the cost and economic viability of each alternative, while discrediting many of the less impactful alternatives on these grounds.⁷⁷ West Basin’s 2018 FAQ on the Project, in response to the question of “How much will the facility cost, and how will it affect water rates?” states that:

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The Project is currently in the environmental phase and a detailed design has not been developed to provide exact cost estimates. West Basin is planning to conduct a future study to evaluate the potential effect on water rates as a result of implementing the Project ...”⁷⁸

It is entirely unreasonable for the DEIR to claim that the Project is more cost effective or economically feasible when no quantitative information is provided to compare its costs to the alternatives, and when the prevailing analysis indicates that seawater desalination costs four to eight times more than less environmentally impactful alternatives.⁷⁹

⁷⁴ Leon Szeptycki, et al., MARINE AND COASTAL IMPACTS OF OCEAN DESALINATION IN CALIFORNIA, Water in the West, Center for Ocean Solutions, Monterey Bay Aquarium, The Nature Conservancy, (2016), available at <http://stanford.io/2axdXE7>.

⁷⁵ CEQA Guidelines § 15126.6 (b).

⁷⁶ CEQA Guidelines § 15126.6 (d).

⁷⁷ DEIR at 7-3 to 7-59.

⁷⁸ West Basin Ocean Water Desalination Project Frequently Asked Questions (FAQs), 2018

<http://www.westbasindesal.org/assets/Documents%20and%20Files/Project%20Materials/West-Basin-FAQ.pdf>

⁷⁹ NRDC et al. PROCEED WITH CAUTION II: CALIFORNIA’S DROUGHTS AND DESALINATION IN CONTEXT, (2016), <https://www.nrdc.org/sites/default/files/california-drought-desalination-2-ib.pdf>

D. West Basin’s evaluation of the Desalination Amendment’s site, design, and technology criteria for evaluating project alternatives should be revised to consider a project that can be configured to minimize impacts.

In an effort to comply with the Desalination Amendment, which “provides a uniform, consistent process for permitting of seawater desalination facilities statewide,”⁸⁰ West Basin has conducted a number of studies to evaluate various options for the Project’s site, design, and technology.⁸¹ Under CEQA, project proponents have a duty to avoid or minimize environmental damage where feasible, including pursuing feasible alternatives that would “substantially lessen any significant effects that the project would have on the environment.”⁸² The Project was designed first and foremost to produce 20 MGD, with the possibility of being expanded to 60MGD. As discussed in the Los Angeles Waterkeeper’s comment letter and incorporated herein by reference, the volume of water to be produced through seawater desalination is arbitrary and unnecessary. Despite its review of different project configurations, West Basin has rejected options that would produce lower volume of water. If the production volume were changed, then the preferred intake technology of subsurface intakes could be considered.

MLBU-30

Co-location with the El Segundo once-through cooled (OTC) power plant runs counter to reduction of impacts to marine life, because this site is not configured to allow for the use of best available site, design or technology.⁸³ In the current Project configuration, the water quality benefits of co-location to utilizing power plant wastewater to dilute desalination brine will be unavailable, because the El Segundo Power Plant will soon phase out, in compliance with the SWRCB’s Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling.⁸⁴ West Basin has decided to use wedgewire screens whose effectiveness is not proven, rather than designing a smaller project that could utilize subsurface intakes. Rather than leading with a set volume of water that is to be produced, the Project should be designed at the outset to utilize best available site, design and technology.

MLBU-31

For the reasons described in this section, the alternatives analysis should be revised to thoroughly consider alternative water supply options based on more reasonable project criteria.

⁸⁰ ST. WATER RESOURCES CONTROL BOARD, DESALINATION FACILITIES AND BRINE DISPOSAL, https://www.waterboards.ca.gov/water_issues/programs/ocean/desalination/ (last visited April 23, 2018).

⁸¹ See DEIR Appendix 2A. “Feasibility Assessment of Subsurface Seawater Intakes Proposed”, Appendix 2B. “Seabed Infiltration Gallery Construction and Life-Cycle Costs”, and Appendix 10. Ocean Plan Amendment Siting and Intake and Discharge Method Considerations”.

⁸² CEQA Guidelines §15021(a)(2)

⁸³ Desal Amdt Final Staff Report at 76.

⁸⁴ California Water Boards, “Ocean Standards – § 316(b) Regulation” https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/

6. A Regional Project of 60 MGD should not be permitted to tier off the DEIR for the Local 20 MGD Project.

The DEIR has made the unreasonable conclusion that, in a number of key instances, because the impacts of the 20 MGD Local Project are less than significant, the impacts of a 60 MGD Regional Project would also be less than significant. For example, in evaluating the water quality impacts of the Regional Project, the DEIR states:

As with the Local Project, the brine discharge would not contribute contaminants or increase their concentration significantly over ambient levels beyond the mixing area ... Therefore, impacts [of the Regional Project] to ocean water quality would be less than significant.⁸⁵

It is unreasonable to assume that the impacts of the Local Project can be extrapolated to the Regional Project on a linear basis. In the presence of other cumulative sources of marine pollution, the withdrawal of three-times more seawater or discharge of this larger volume of brine effluent may have a greater than three-times the impacts. Even if a conclusion of less than significant impact for the Local Project is correct, this finding cannot be applied without the conduct of fresh analysis to a project three-times the size. The DEIR does not account for one-to-one increase in impacts; more likely, it does not acknowledge that the impacts are likely to be multiplied, potentially exponentially.

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The DEIR has attempted to establish that nearly all assessments of impacts at the 20 MGD Local Project level should apply to projects at the 60 MGD Regional level, essentially asserting that the Regional Project should be allowed to tier off the Local Project. CEQA allows for tiering of environmental impact reports when the first EIR is prepared at the larger, more general level, "prepared and certified for a program, plan, policy, or ordinance."⁸⁶ The DEIR has taken the opposite approach: it asserts that a narrower project could be used to tier approval of a project three times the size. If the 60 MGD project is the actual goal of this development, all assessment of impacts should be based on the impacts of a project of that size.

West Basin has prepared a lengthy DEIR, but there are significant gaps in the analysis. The City is concerned that a number of the significant impacts have not been accounted for and requests that the DEIR be revised and recirculated. West Basin is also encouraged to consider reconfiguring the Project so that it can utilize subsurface intakes and operate entirely on renewable energy at a flexible, scaled-down level, tailored to meet demand.

MLBU-33

⁸⁵ DEIR at 5.9-60.

⁸⁶ CEQA § § 21094(a)(1); CEQA Guidelines § 15152.

Sincerely,

Craig George
Environmental Sustainability Director

cc: Reva Feldman, City Manager



Comment Letter CITY OF MANHATTAN BEACH

From: Alise Kabakoff
To: [West Basin Desal EIR](#)
Cc: [Quinn M. Barrow](#)
Subject: Request for Comment Period Extension - Ocean Water Desalination Project
Date: Tuesday, April 24, 2018 3:16:06 PM
Attachments: [image001.jpg](#)
[Letter to Zita Yu re Request for Comment Period Extension \(West Basin Municipal Water District\).PDF](#)

Dr. Yu:

Please see the attached sent on behalf of Mr. Barrow.

Thank you.

Alise Kabakoff

Legal Assistant



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Michael Estrada, Esq*

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MBCH-1

Comment Letter CITY OF MANHATTAN BEACH

Quinn M. Barrow



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April 24, 2018

VIA ELECTRONIC MAIL

Zita Yu, Ph.D., P.E., Project Manager
West Basin Municipal Water District
17140 South Avalon Boulevard
Carson, California 90746
desalEIR@westbasin.org

Re: Request for Comment Period Extension

Dear Dr. Yu:

I am writing on behalf of the City of Manhattan Beach to request a 30-day extension to the comment period for the Draft Environmental Impact Report (DEIR) for West Basin Municipal Water District's (WBMWD) proposed Ocean Water Desalination Project. We are requesting that the deadline for comments be extended to 5:00 p.m. on June 25, 2018.

WBMWD's proposed Ocean Water Desalination Project would be sited in close proximity to the City of Manhattan Beach, involves a commitment of a significant amount of limited resources, and impacts the future of Los Angeles County's water supply. As such, the City of Manhattan Beach is committed to providing thorough comments on this DEIR.

To date, our review of the DEIR has required locating and reviewing an extensive number of lengthy documents that, while referenced in the DEIR, are not included in the DEIR or the appendices. Preliminary review of such documents has revealed that they bear directly on analyses at issue in the DEIR. In light of this, we believe the current 60-day comment period does not allow adequate time to provide meaningful comments and request that the comment period be extended to 5:00 p.m. on June 25, 2018. Because the DEIR is a culmination of WBMWD's Ocean Water Desalination Program that initially began in 2002, a brief 30-day extension will promote more thoughtful public comments without significantly impacting the project schedule.

Thank you for your consideration.

Very truly yours,

Quinn M. Barrow
City Attorney, City of Manhattan Beach

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MBCH-1

Comment Letter CITY OF MANHATTAN BEACH2

From: Quinn M. Barrow
To: [West Basin Desal EIR](#)
Cc: [Patrick Sheilds](#)
Subject: FW: Request for Comment Period Extension - Ocean Water Desalination Project
Date: Tuesday, May 01, 2018 3:23:05 PM
Attachments: [Letter to Zita Yu re Request for Comment Period Extension \(West Basin Mu....pdf](#)

Dear Dr. Yu and Mr. Sheilds,

On April 24, 2018, we sent the attached letter on behalf of the City of Manhattan Beach requesting a 30-day extension of the comment period for the Draft Environmental Impact Report for the West Basin Municipal Water District's proposed Ocean Desalination Project. As explained in the letter, we believe that the current 60-day comment period does not allow adequate time to provide meaningful comments.

Due to the time-intensive nature of this review, we would appreciate a response to this request by Thursday, May 3, 2018. To the extent that staff determines that the Board of Directors needs to consider this extension request, we request that you agendaize the request for the Special Meeting of the Board of Directors that, according to the District's website, is scheduled for 10:15 a.m. on May 3, 2018. If the item is placed on the agenda for the May 3 special meeting, please let us know at your earliest convenience.

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Thank you,

Quinn M. Barrow
City Attorney
City of Manhattan Beach

Comment Letter CITY OF MANHATTAN BEACH2

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April 24, 2018

VIA ELECTRONIC MAIL

Zita Yu, Ph.D., P.E., Project Manager
West Basin Municipal Water District
17140 South Avalon Boulevard
Carson, California 90746
desalEIR@westbasin.org

Re: Request for Comment Period Extension

Dear Dr. Yu:

I am writing on behalf of the City of Manhattan Beach to request a 30-day extension to the comment period for the Draft Environmental Impact Report (DEIR) for West Basin Municipal Water District's (WBMWD) proposed Ocean Water Desalination Project. We are requesting that the deadline for comments be extended to 5:00 p.m. on June 25, 2018.

WBMWD's proposed Ocean Water Desalination Project would be sited in close proximity to the City of Manhattan Beach, involves a commitment of a significant amount of limited resources, and impacts the future of Los Angeles County's water supply. As such, the City of Manhattan Beach is committed to providing thorough comments on this DEIR.

To date, our review of the DEIR has required locating and reviewing an extensive number of lengthy documents that, while referenced in the DEIR, are not included in the DEIR or the appendices. Preliminary review of such documents has revealed that they bear directly on analyses at issue in the DEIR. In light of this, we believe the current 60-day comment period does not allow adequate time to provide meaningful comments and request that the comment period be extended to 5:00 p.m. on June 25, 2018. Because the DEIR is a culmination of WBMWD's Ocean Water Desalination Program that initially began in 2002, a brief 30-day extension will promote more thoughtful public comments without significantly impacting the project schedule.

Thank you for your consideration.

Very truly yours,

Quinn M. Barrow
City Attorney, City of Manhattan Beach

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City of Manhattan Beach

Community Development Department

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June 25, 2018

West Basin Municipal Water District
Attn: Zita Yu, Ph.D., P.E., Project Manager
17140 South Avalon Boulevard, Suite 210
Carson, California 90746

Via First Class Mail and Electronic Mail to: desalEIR@westbasin.org

Dear Dr. Yu:

On behalf of the City of Manhattan Beach (“Manhattan Beach” or “City”), we submit the following comments on the Draft Environmental Impact Report (“Draft EIR”), State Clearinghouse No. 2015081087, dated March 2018, which was prepared in connection with the West Basin Municipal Water District’s (“West Basin”) proposed Ocean Water Desalination Project (the “project”). As stated in the Notice of Preparation for the Draft EIR, the purpose of the project is “to produce between 20 and 60 million gallons per day of potable drinking water.” It further claims that “[t]he 20 MGD capacity is the minimum capacity needed to meet the West Basin service area’s future water demands at a local scale, consistent with West Basin’s UWMP and Water Reliability 2020 Program objectives to reduce dependence on imported water.”

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Based on the numerous comments set forth below, Manhattan Beach contends that the Draft EIR fails to comply with the requirements of the California Environmental Quality Act (CEQA) (Pub. Res. Code § 21000 *et seq.*), and the State of California Guidelines for the California Environmental Quality Act (14 Cal. Code Regs. § 15000 *et seq.*), including CEQA’s public disclosure mandates. Accordingly, Manhattan Beach requests that West Basin suspend any further consideration of the project until a Draft EIR that fully discloses, analyzes, and identifies all feasible mitigation to reduce the impacts of the project has been prepared and recirculated for public review and comment. Manhattan Beach objects to any further action by West Basin on the project until the necessary and proper environmental review has been completed.

Manhattan Beach requests that written responses to each of the following comments be provided in accordance with CEQA Guidelines section 15088.

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I. The Draft EIR Fails to Analyze the Environmental Impacts of the Whole of the Project by Piecemealing Analysis of the Local Project and the Regional Project

Throughout the EIR, the environmental analysis of the Regional Project impermissibly analyzes its impacts by reasoning that the Regional Project’s operational expansion (i.e., Regional Project compared to Local Project) is similar to the implementation of the Local Project (i.e., baseline conditions compared to Local Project). This is impermissible for two reasons: First, the programmatic portion of the EIR must base its analysis on the current baseline environmental conditions at the time the NOP for the Programmatic EIR was issued, which is with no desalination facilities present. Second, the analysis fails to analyze whether the entire project exceeds applicable thresholds and does not account for potentially compounding impacts of the two project components.

II. The Draft EIR’s Analysis is Flawed in Several Respects

CEQA is clear: “An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” CEQA Guidelines § 15151. The Draft EIR in its present form fails to comply with this requirement as the analysis is flawed in several critical respects, as discussed below.

MBCH3-2

A. Project Description

The description of the project is not stable and definitive. Rather, the project is either at the North Site, or perhaps the South Site, and may have a capacity of 20 MGD, 40 MGD, or 60 MGD. Further, the Local Project includes significant elements of the “Regional Project” such that any future environmental analysis will be constrained in the ability to consider mitigation measures or alternatives to address environmental impacts. At bottom, it appears that West Basin has defined the project to segment the Local Project from the Regional Project, which is the real project being contemplated. In so doing, West Basin provides a veneer of analysis on the Local Project, while deferring to some future time the analysis of the full project – the Regional Project. In order to fulfill CEQA’s requirements to describe and analyze the entire scope of the project and to fully disclose the potential environmental impacts, the EIR must be revised to provide a full discussion of the Regional Project components and a full analysis of that project. If the District needs to refine design elements in the future, after the analysis of the full Regional Project as now clearly envisioned, further review (supplemental EIR, subsequent EIR, or perhaps even one or more addenda) would be appropriate.

The project description provides passing references to waste backwash treatments, chemical cleaning solutions, and chemical waste naturalization systems, but does not provide sufficient detail regarding the treatment and naturalization systems to understand whether those processes have the potential to cause environmental impacts. The project description must be expanded to explain these processes, and the environmental analysis needs to be augmented to explain the potential for impacts, such as impacts on sewer systems based on disposal of the wastes. This is of particular concern to the City because the Draft EIR suggests that the waste materials could be pumped into the Manhattan Beach local sanitary sewer lines.

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Table 3-2 discusses desalinization facility chemicals, however, there is no disclosure of the potential risks associated with spills of these chemicals. The Draft EIR should fully disclose each chemical's potential risks and impacts to human (and other) life in the event exposure were to result from spillage or some other release.

MBCH3-4

The project description lacks details regarding the location and number of parking spaces to be provided on the site (whether the North or South Site), and the site plans fail to disclose the details of the parking lots. Without this aspect of the proposed project disclosed, reviewers are unable to assess the potential for impacts that could result from the proposed parking facility, including aesthetics, biological resources, and traffic and circulation impacts that could be caused by spillover parking, particularly when the auditorium is in use. It is also unclear whether or not parking areas would be impacted by the "Regional Project" construction.

MBCH3-5

The project description states:

"At times, during startup and infrequently during upsets while the plant is in operation, it may be necessary to bypass the entire treatment facility to discharge. Thus, the discharge system would be sized for a peak discharge from the plant of 41 to 46 MGD." (p. 3-13.)

It also states:

"Depending on pretreatment processes and washwater recycling, the discharge system would be sized for peak discharge of 83 to 95 MGD." (p. 3-17.)

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The potential system bypass scenarios are not explained in any meaningful way, and it is unclear how much treatment already may have occurred before the bypass, and whether this discharge includes RO concentrate, backwash water, chemically treated materials, partially treated water, or perhaps all of the above. The system apparently will be designed to accommodate full bypass discharge of up to 95 MGD; however, the impacts of such discharges are not adequately disclosed.

The project description acknowledges that on-site storage of chemicals would occur; however, there is no discussion or quantification of the amount of chemicals that would need to be stored for the ultimate Regional Project. The project description states that "[o]n-site storage of chemicals would be sufficient for 10 to 20 days of usage at average dosage rates"; however, the quantities needed for this period of time likely would increase substantially under the Regional Project. The increased chemical quantities must be disclosed, and the potential impacts of the expanded chemical storage activities must be fully disclosed and analyzed.

MBCH3-7

Table 3-11 provides a list of permits, approvals, and regulatory requirements. The list, however, does not contain any mention of approvals that would be necessary for use of park space for pumps necessary for the desalinated water conveyance components under the Regional Project scenario. Further, there is no identification of the process that will be undertaken to replace the lost parkland.

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B. Basis of Cumulative Analysis

The discussion of existing facilities in the Draft EIR acknowledges that “the Southern California Bight supports many more” ocean water intake/discharge facilities; however, only those located “near” the proposed Project are considered. (p. 4-12.) A complete list of the intake/discharge facilities in the Southern California Bight should be disclosed. Failure to include a comprehensive list and to analyze the full cumulative impact potential results in an inadequate Draft EIR.

MBCH3-9

C. Aesthetics

1. Scenic Resources

At the outset, it is not clear whether impacts from the potential expansion of energy facilities were analyzed with respect to impacts on scenic resources. Were the potential new power poles (p. 5.5-21) analyzed?

MBCH3-10

Even based on the current scope of the analysis, there is no evidence or support for the Draft EIR’s conclusion of less than significant impacts with mitigation for construction impacts to scenic resources as it relates to the South Site. The proposed project will place construction materials and equipment into the public viewshed of scenic resources, thereby impairing those resources. The Draft EIR (pp. 5.1-10 through 5.1-11) relies in large part on the impacts being “temporary” to justify the conclusion of LTSM. On the contrary, the construction period for the Local Project alone is five years – which is 1/6 of the anticipated project lifetime based on South Coast Air Quality Management District (“SCAQMD”) assumptions (p. 5.7-28, Table 5.7-4, fn. 3). And, the construction period for the Regional Project is a full eight years – over one quarter of the project’s total anticipated lifetime. Impacts lasting this long cannot be considered “temporary,” and there is no support for the LTSM conclusion.

MBCH3-11

Compounding this problem is the fact that the mitigation measures proposed to address impacts to scenic resources constitute impermissible deferred mitigation and are not enforceable, nor is there any evidence that they actually will reduce significant aesthetics impacts to less than significant. For example, mitigation measure AES-1 states that staging areas will be sited or screened to minimize public views “to the maximum extent practicable.” Who determines what is the “maximum extent practicable”? When is that determined? What is the basis or benchmark standards that will be used for determining what is the “maximum extent practicable”? None of this information is provided, rendering the mitigation measure flawed and impermissibly deferring actual mitigation.

MBCH3-12

Mitigation measure AES-2 is similarly problematic, stating that rooftop mechanical and electrical equipment will be placed so that it is not highly visible or is screened “where possible.” Again, who determines what is “possible”; and what standards will be used to make that determination? From what vantage points will the analysis be made?

MBCH3-13

In addition to the specific problems with these mitigation measures, there is no evidence that they will reduce significant impacts to scenic resources to less than significant. How will screening “where possible” mitigate eight years of construction impacts in the case of the Regional Project or five years of impacts in the case of the Local Project?

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The Draft EIR’s flaws with respect to aesthetic impacts to scenic resources are unfortunately not limited to construction impacts. The Draft EIR concludes that there will be less than significant operational impacts to scenic resources with the inclusion of mitigation (the same flawed mitigation measures discussed above). There is simply no support for this conclusion. For example, Key View 3 in its current condition plainly shows widespread ocean views (Figure 5.1-4). The visual simulation from this Key View with the Local Project shows a large building blocking nearly all of the ocean view (Figure 5.1-8), with even more massing blocking the view for the Regional Project (Figure 5.1-13). How can the Draft EIR contend that impacts to scenic resources will be less than significant when the Draft EIR’s own visual simulations directly refute this and show a permanent impairment of scenic views from a Key View location?

MBCH3-15

Moreover, the Regional Project bases its conclusion of LTSM with respect to operational impacts on a comparison with “historic uses on the site” (p. 5.1-17). This is a false comparison and an improper baseline. The Draft EIR must analyze, and base its impact conclusions on, what is physically present on the site now, and the scenic views afforded to the public now, not what might have been present on the site previously but no longer exists.

MBCH3-16

The Draft EIR also concludes that both the Local and Regional Projects will be consistent with the Coastal Act. There is no support for this conclusion given that both projects directly contravene the El Segundo LCP and the Coastal Act in general because they block views of scenic coastal areas, as described immediately above.

MBCH3-17

While the Draft EIR gives passing mention to the LCP and the Coastal Act, there is no analysis of the project’s consistency, or lack thereof, with the Manhattan Beach General Plan and, specifically, Policy LU-4.1 regarding protecting “enjoyment of the beach.” This policy is listed as a relevant policy (p. 5.1-3) and, therefore, the project’s consistency with the policy should be analyzed.

MBCH3-18

2. Visual Character/Quality

The Draft EIR concludes that impacts to visual character and quality will be less than significant with mitigation, but evidence in the Draft EIR contradicts this conclusion with respect to the South Site. Specifically, as shown from Key View 3, the proposed project is not compatible with the existing residential neighborhoods, including El Porto in Manhattan Beach.

MBCH3-19

The proposed mitigation measures – the exact same measures proposed for impacts to scenic resources which, as discussed above, constitute impermissible deferred mitigation – do not reduce impacts to less than significant. Specifically, as with scenic resources, how will the proposed mitigation measures reduce impacts to the visual character of the area during either five years (Local Project) or eight years (Regional Project) of construction? How will the mitigation measures reduce permanent (operational) impacts to visual character given the adverse change in the visual character of the area depicted in Key View 3, among others?

In addition, the Draft EIR underestimates potential impacts from the Regional Project by analyzing and disclosing only the incremental increase in impacts from the Local Project, as opposed to the Regional Project’s actual impacts compared to the current baseline of what is physically on the project site now. So, while the Draft EIR concedes that the Regional Project will have greater visual impacts than the Local Project, the Draft EIR conceals those impacts by focusing only on

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the change from the Local Project, as though it already were built. This is an incorrect approach. The Regional Project will degrade visual character significantly, but it is impossible to discern exactly how significant the impacts will be given the improper baseline that the Draft EIR uses.

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Finally, please explain how the same mitigation measures proposed to address visual character impacts caused by the Local Project suffice to address and reduce impacts from the Regional Project to less than significant, given that the Regional Project is larger and has greater hardscape, thus increasing its visual impacts.

MBCH3-21

3. Light and Glare

Continuing a theme, the Draft EIR concludes that construction-related light and glare impacts from the Local Project will be less than significant based on the “temporary” nature of construction. Given that construction will occur over a minimum five-year period, or eight years if the Regional Project were to be constructed, these adverse impacts cannot be considered temporary in nature. As a result, there is no evidence to support the conclusion that impacts here are less than significant.

In addition, the two mitigation measures proposed to reduce the project’s operational light and glare impacts to less than significant amount to impermissible deferred mitigation. For example mitigation measure AES-6 states that an Outdoor Lighting Plan will be prepared to “ensure that any exterior lighting does not spill over onto the adjacent residential uses.” What is the benchmark standard for what constitutes impermissible spill over? Is it a certain number of footcandles or some other standard of measurement? Who will decide what constitutes “impermissible” spill over? When will this be decided?

MBCH3-22

Similarly, AES-7 requires painting or otherwise treating the desalination facility to minimize visual intrusion and consistency with “local laws, ordinances, regulations, and standards.” What are the specific laws, ordinances, regulations, and standards that will apply? Who will decide what is sufficient? What is the benchmark that will be used to determine whether an impact is “minimized”?

D. Air Quality

The Federal Conformity Analysis for SRF (CEQA Plus) determination in connection with Impact AQ 5.2-1 relies on ignoring the actual implications of the project’s exceedance of NO_x emissions during construction. As shown in Table 5.2-7, the Local Project and the Regional Project both exceed de minimis levels of NO_x emissions during construction. Yet, the Draft EIR concludes that the projects are consistent with the State Implementation Plan (“SIP”). There is no support for this conclusion when, as the Draft EIR acknowledges, the General Conformity process is designed to ensure that actions “do not cause or contribute to new violations” and “do not increase the frequency or severity of existing regulations.” (p. 5.2-25.) By exceeding the de minimis thresholds for NO_x, the project inhibits compliance with the SIP, a conclusion that is further supported by the Significant and Unavoidable impact determination in Impacts AQ 5.2-2 and 5.2-3, based on the project’s NO_x emissions during construction and the exceedance of air quality standards.

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Mitigation Measure AQ-3 includes a bulleted point discussing use of Tier 4 engine certification, and potential “alternative measures” if this standard cannot be achieved. The measure states that the “effectiveness of alternative measures must be demonstrated through future study with written findings supported by substantial evidence that is approved by the lead agency before use.” Will the process of determining the equivalence of proposed alternate measures allow for public notice and participation?

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Please provide further information regarding Table 5.2-18 and, specifically, what the “refined analysis for Offshore Emissions” is. Based on the Maximum Offshore Emissions line in the table, the Local Project exceeds applicable thresholds for NO_x, yet the ultimate conclusion for NO_x is less than significant.

MBCH3-25

The discussion of construction-related TACs initially states that the project will have significant impacts at the South Site because it “exceed[s] the 10 in a million threshold (approximately 48 in one million)” (p. 5.2-49), thus exceeding the threshold by a factor of four. The discussion then concludes that Mitigation Measures AQ-1 through AQ-3 will reduce the risk of chronic health impacts to less than significant, but there is no quantitative analysis presented in the Draft EIR to justify this conclusion or to demonstrate whether and how the proposed mitigation will reduce impacts to less than significant; the same flaw is true with respect to the Regional Project (p. 5.2-53).

MBCH3-26

The Draft EIR’s discussion of objectionable odors related to construction relies on the same flawed premise as discussed elsewhere in this letter – namely, that impacts may be considered less than significant because the construction is “of relatively limited duration” (p. 5.2-56). This is simply not accurate. For those Manhattan Beach residents living on 45th Street, approximately 100 feet away from the South Site, five years of construction (Local Project) or eight years of construction (Regional Project) is hardly “of limited duration.” On the contrary, the objectionable odors caused by construction will have a marked, adverse impact on those residents. In short, there is no support in the Draft EIR for the conclusion that objectionable, construction-related odors will be less than significant.

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E. Biological Resources – Terrestrial

The Draft EIR fails to adequately assess the baseline conditions for the water conveyance corridors and regional pump station sites and construction staging areas. Rather than undertake surveys of the areas that could be impacted, the Draft EIR states that the areas are “devoid of natural vegetation and associated wildlife (p. 5.3-11). This conclusion was based on a review of aerial photography; however, site analysis through a biological survey should not be deferred, and is necessary to establish an adequate baseline for impact analysis. It is noteworthy that a reconnaissance-level survey of the alignments was completed for cultural resources, calling into question why the same protocol was not undertaken for biological resources. The lack of meaningful site surveys undermines the assumptions throughout the analysis of biological impacts that the conveyance system and pump locations “are devoid of natural vegetation.” (See, e.g., p. 5.3-16.) Without an understanding of the baseline, the Draft EIR fails to fulfill CEQA’s disclosure requirements, thereby undermining the biological impact conclusions.

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Similarly, the nesting birds survey was completed in November 2015, outside of the avian nesting season. (p. 5.3-15.) It is unclear why the survey wasn't completed during the nesting season, and the timing all but guaranteed that no nesting birds would be identified. A new survey during the nesting season should be undertaken in order to properly identify the baseline conditions.

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A survey of plant communities for the project site was conducted on November 2, 2015, with a more narrow survey of El Segundo blue butterfly habitat areas completed on July 12, 2016. These survey times, however, did not cover blooming periods for many of the plants listed in Table 5.3-1. It is unclear why the survey was not conducted at a time when most of the sensitive plants could be blooming, to enhance identification potential. Choosing the November period for the main survey undermines the establishment of a solid baseline condition from which to assess impacts. Further, it is unclear why coast buckwheat (*Ergonum parvifolium*), the host plant for the El Segundo blue butterfly, is not listed in Table 5.3-1.

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Without an adequate survey of the North and South Sites, the conclusion that the desalination facility construction would not impact special-status plant species is not adequately supported.

Although mitigation of potential biological impacts is identified, the measures improperly defer the mitigation. For example, BIO-2 requires avoidance of sensitive species, but defers the extent of monitoring to a future time without any minimum standards or protocols identified. BIO-2 is inadequate without establishment of meaningful performance standards.

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Mitigation measure BIO-6 requires a western snowy plover survey prior to commencement of ground disturbing activities; however, the measure does not establish how close to construction commencement the survey should be completed. Mitigation measure BIO-5 requires a nesting bird survey to be completed within 72 hours preceding disturbance activities, and BIO-6 should have a similar temporal component.

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The cumulative analysis of biological resources does not analyze potential cumulative impacts to the western snowy plover. Given the sensitivity of this species, a detailed cumulative analysis is warranted and should be based on a list of other projects with the potential to impact the species.

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F. Cultural Resources

The research of cultural resources states that three "historic-period built environmental resources... are located within or immediately adjacent to the Project site." (p. 5.4-21.) These resources are the Hawthorne High School, an apartment building, and the ESGS. The Draft EIR discussion of the potential impacts of the conveyance pipelines simply states that "[b]ecause the pipelines would be installed beneath the existing street right-of-ways, the Project would not directly impact" the high school or the apartment building. There is not, however, any discussion of the potential construction-related vibration impacts on these resources, or the special vibration thresholds of impact that apply to older buildings. The Draft EIR fails to fully disclose the potential construction impacts in this regard.

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The Draft EIR states that the offshore portion of the project "appears to have the potential to contain archaeological deposits dating between approximately 12,000 and 4,000 years ago." (p. 5.4-24.) However, the Draft EIR does not call for any monitoring or further site analysis of the

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now submerged lands in which these resources may reside. Will there be archaeological or tribal cultural resource monitors present during any aspect of the underwater construction?

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Mitigation Measure CUL-3 improperly defers analysis and mitigation of potential archaeological impacts. Rather than identifying resources in the Draft EIR, a cultural resources monitoring and mitigation plan (“CRMMP”) would be prepared in the future prior to construction. Those measures should be identified now and included in the mitigation monitoring and reporting program that must be adopted if the project is approved. The deferred analysis and mitigation will only be disclosed after the fact and with no opportunity for public review or comment. The minimal contents of the CRMMP that are referenced in CUL-3 include monitoring methodology, future identification of the areas of the project in which monitoring would be required, and measures to minimize potential impact of inadvertent discoveries of resources. Each of these aspects of the CRMMP can and must be completed as part of the Draft EIR. Further, it is unclear whether the CRMMP also will cover the underwater areas to be disturbed in conjunction with the intake and outflow elements of the project, and what additional or different monitoring measures would be required for that marine environment.

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Mitigation Measure CUL-4 also improperly defers mitigation and does not disclose the type of mitigation that may be employed or the circumstance when different types of mitigation may be appropriate. Further, there is no mention of whether this mitigation will apply in the marine environments where intake and outflow construction will occur. Further, the mitigation measure mentions resource recovery, but does not acknowledge that recovery often is not the preferred or appropriate approach when leaving resources properly secured in place is an option.

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Mitigation Measure CUL-5 does not explain whether certain sensitive information would be kept confidential. If that is the intent, the mitigation measure should be revised to make that clear.

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Mitigation Measure CUL-8 improperly defers analysis and mitigation of potential paleontological impacts. Rather than identifying resources in the Draft EIR, a paleontological resources monitoring and mitigation plan (“PRMMP”) would be prepared in the future prior to construction. Those measures should be identified now and included in the mitigation monitoring and reporting program that must be adopted if the project is approved. The deferred analysis and mitigation will only be disclosed after the fact and with no opportunity for public review or comment. The contents of the PRMMP referenced in CUL-8 are not specified in any meaningful way, whereas CEQA requires that each of these aspects be completed as part of the Draft EIR. Further, it is unclear whether the PRMMP will also cover the underwater areas to be disturbed in conjunction with the intake and outflow elements of the project, and what additional or different monitoring measures would be required for that marine environment.

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The Draft EIR assumes that excavations of ten feet or less into older Quaternary alluvial deposits will not result in any impacts; however, there is no explanation of how that threshold was determined or what evidence was relied upon in establishing the threshold. Further, the Draft EIR does not adequately address the potential impacts of the intake/outflow construction in areas that previously were not submerged, and thus appear to have the possibility of containing paleontological resources. Similarly, mitigation measure CUL-10 utilizes an eight-foot threshold, however the basis for that threshold is not explained in the Draft EIR. What will happen with respect to resources that are discovered in depths less than eight or ten feet?

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G. Energy

Please clarify – what are the “on-site solar power generation” facilities referenced on page 5.5-15?

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The Draft EIR asserts that anti-idling requirements will result in “energy savings” with respect to construction-related energy impacts (p. 5.5-16). How does the use of vehicles, even if fuel-efficient, result in “energy savings” if, absent the project, no construction for the project would occur and no vehicles would be used on the site? From a baseline perspective of no activity, the expenditure of fuels does not result in “energy savings.”

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Table 5.5-4 shows total energy consumption comparisons, purportedly to show the project’s small energy consumption relative to overall use. This is a false comparison. First, the comparison is from the project to Los Angeles County *overall*, which is improper because it is not comparable to the project – that is, comparing the project’s energy demands to the annual energy consumption across a county of several million people and businesses serves no purpose other than to try and downplay the energy demands of the project. Second, why is the comparison to the County and not to other water supply and delivery systems? What is the energy demand of the proposed project compared to stormwater capture projects? What is the energy demand of the proposed project compared to other desalination facilities? That information is far more relevant, and the failure to disclose is it is a flaw in the Draft EIR.

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Similarly, the Draft EIR relies in part on Table 5.5-4 to reach an unsupported conclusion of LTSM with respect to Impact ENERGY 5.5-3, and incorrectly concludes that the project would not cause wasteful, inefficient, and unnecessary consumption of energy. There is no way to determine how inefficient and wasteful the project is based on the information provided in Table 5.5-4, which provides no valid point of comparison. In addition, Impact ENERGY 5.5-3 attempts to justify the LTSM conclusion by asserting that the project “is not considered wasteful because it results in a diversified water supply that reduces dependency on imported water, increase[] drought resiliency, and increase[] water reliability.” (p. 5.5-19.) This is an improper factor for measuring the project’s energy outputs and wastefulness. In other words, a project’s energy efficiency cannot be based on the purported benefits of the project. Please provide a comparison of the project’s energy demands and those of other water supply and delivery systems.

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With respect to Electrical Energy Demand and Infrastructure, the Draft EIR admits that the desalination facilities “would result in an increased demand for energy in order to provide increased reliability of an essential service” (p. 5.5-21) but then claims that the project would not result in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure “other than as noted above.” (p. 5.5-21.) What is noted above **are** new and expanded energy delivery systems, including new poles and a new electrical substation; thus, there clearly is an impact, and the project exceeds the threshold under Impact ENERGY 5.5-3. To reduce this impact, the Draft EIR relies solely on Mitigation Measure GHG-1 to reduce impacts to LTSM. Setting aside the significant deficiencies in Mitigation Measure GHG-1 (discussed below in this letter), will GHG-1 result in the need for no electrical poles or electrical substation to be built? If not, the proposed mitigation is not actually reducing the impacts of ENERGY 5.5-3 to less than significant. Please provide a quantification of the reduced energy demand as a result of GHG-1 and also clarify whether GHG-1 definitively will result in no new electrical poles or electrical substation being built as part of the project.

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What is the basis for using SCE’s entire service area (which encompasses more than 180 cities) as the geographic basis for an analysis of cumulative energy impacts? This selection appears designed to underplay the significance of the project’s energy demands by, in essence, enlarging the denominator so the numerator appears minute by comparison. Why is the geographic basis not simply West Basin’s service area?

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H. Geology, Soils, and Seismicity

The Draft EIR states, “the potential for lateral spreading at the proposed desalinated water conveyance corridors and regional pump station optional sites is unknown at this time” (p. 5.6-2). Without analysis of the identified sites, the baseline conditions to which the proposed project must be compared is not adequate or disclosed.

MBCH3-47

The Draft EIR fails to establish an adequate baseline condition for analysis the site because it omits the fact that the El Segundo Local Coastal Plan (ESLCP) considers the area a hazard area where impacts can extend beyond local significance. (ESLCP Staff Summary & Recommendations; p. 6-8; 9.) The Draft EIR, therefore, also fails to disclose the potential for beach erosion, and potential slope instability that could trigger landslide activity and damage to the public bicycle trail and the proposed desalination facilities. The narrow expanse of beach in this area seaward of the project sites could cause impacts to be even greater in this area, and the analysis does not consider the further impacts that would accompany rising sea levels in the coming decades as a result of global climate change.

MBCH3-48
MBCH3-49

Construction-related impacts are found to be less than significant; however, the sole justification for this conclusion is that construction activities are “temporary” (p. 5.6-15; 5.6-17). Temporary impacts can still be significant. Similarly, the Draft EIR concludes that seismic damage to the intake and discharge tunnels could result in “temporary shutdown of the system” and relies solely on the temporary nature to reach the less than significant conclusion. (p. 5.6-16). Further analysis and explanation is required to fulfill CEQA’s requirements and information disclosure mandate.

MBCH3-50

The Draft EIR states that the ESGS site “does not appear to contain soils susceptible to expansion”; however, no evidence is provided to support this statement.

Figure 5.6-2 shows the location of monitoring wells and field sampling locations. While there are various locations on the North Site that have been sampled or monitored, there is only one location on the South Site. Further analysis of soil conditions is warranted on both the North and South Sites in order to disclose the existing baseline geologic and soils conditions; it is critically important for the South Site because so little has been done to date.

MBCH3-51

I. Greenhouse Gas Emissions

The discussion under Impact GHG 5.7-1 includes a quantification of the project’s annual GHG emissions (Table 5.7-4), but the Draft EIR does not include any quantitative threshold in this area against which to judge the significance of the project’s GHG impacts. Under even the charitable analysis in Table 5.7-3, which takes credit for a reduction in GHG emissions associated with the current imported water delivery, the Local Project will result in 10,959 annual MTCO_{2e} emissions (Table 5.7-3). The Regional Project will result in nearly triple that amount of emissions, 36,765 MTCO_{2e} (Table 5.7-4). Yet, the Draft EIR provides no threshold of significance against which

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these emissions are measured. Why does the Draft EIR not use, for example, SCAQMD’s 10,000 MTCO₂e standard for industrial projects, or a similar numeric threshold?

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MBCH3-52

In Table 5.7-3, are the annual operational energy emissions averaged over the life of the Local Project? If so, what is the breakdown per year? Is it constant every year of operation?

MBCH3-53

In the discussion of the Local Project’s construction-related impacts (p. 5.7-26), the Draft EIR states that the total Local Project GHG emissions would be reduced to less than the emissions associated with the equivalent volume of imported water (currently, 15,064 MTCO₂e). What is the justification for using a net-zero goal as an emissions threshold rather than a numeric one?

MBCH3-54

The discussion of the Regional Project’s GHG emissions assumes a linear or incremental increase in GHG emissions from the Local Project. What is the basis for this assumption? There is no evidence in the Draft EIR to support the assumption that the Regional Project’s GHG emissions will simply be incrementally worse than the Local Project’s emissions.

MBCH3-55

The discussion of Mitigation Measure GHG-1 does not include any quantitative analysis of the reduction in GHGs. Please provide a quantitative breakdown of the emissions reductions from each of the elements of GHG-1 to demonstrate how impacts are reduced to less than significant.

MBCH3-56

In addition, Mitigation Measure GHG-1 is flawed in several significant ways and constitutes impermissible deferred mitigation. The measure requires preparation of an Energy Minimization and GHG Reduction Plan, but does not say who (what staff) will review and approve the plan, what the level of public involvement will be, or what factors will be used in reviewing the plan. Similarly, the mitigation measure promises that West Basin will incorporate into the plan “all available feasible energy recovery and conservation technologies” or will explain why those technologies are not feasible. Who decides what is feasible? When? Is there an opportunity for public review and comment on that decision? Absent some public input and oversight into this process, the possibility exists that the Draft EIR will conclude GHG impacts are less than significant, but the actual result will be different if technologies are discounted because they purportedly are not feasible.

MBCH3-57

Furthering this concern is additional language in Mitigation Measure GHG-1, which states that “West Basin shall implement items a. and b. and progress through the remainder (items c. through e.) on the basis of the options’ physical and economic feasibility, as reasonably determined by West Basin...” In essence, it appears that West Basin will be the arbiter of whether to implement and enforce mitigation for its own project, and may rely on economic justifications to avoid implementing mitigation. This is not enforceable mitigation if West Basin can simply decide it is too expensive to pursue technologies and strategies listed as “required” under this mitigation measure. Absent some assurance that (1) mitigation will be implemented and (2) mitigation will reduce impacts to less than significant, Mitigation Measure GHG-1 fails to achieve what it claims and GHG impacts remain significant.

MBCH3-58

With respect to Mitigation Measure GHG-2, what is the public process for involvement of the verification of the annual GHG Report? What if the public disagrees with the analysis or conclusions in the report? Is there a process for addressing this concern to ensure enforcement of the mitigation?

MBCH3-59

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Does Table 5.7-6 include any desalination activities? If not, doesn't this demonstrate that GHG emissions reductions that are achieved by water conservation and recycling programs *other* than desalination? The Table appears to show that GHG emissions will be reduced by 26,827 in 2020, before the desalination facility comes online. How will these numbers change when the Local Project's 10,959 annual MTCO₂e emissions and the Regional Project's 36,765 MTCO₂e emissions are considered?

MBCH3-60

J. Hazards and Hazardous Materials

The Project Description notes that the Draft EIR assumes off-shore sediment disposal from off-shore dredging (see footnote 7). It also indicates that on-shore disposal will be necessary if the dredged material is contaminated or does not meet established criteria. The Hazards and Hazardous Materials section does not explain or analyze the potential for contaminated sediment. How and when will testing of the sediment occur to determine whether on-shore disposal is necessary? Will it occur on-shore or off-shore, and are there associated environmental impacts? Further, in the event that contamination is found, what measures will be taken to ensure that it will not be released into the water?

MBCH3-61

Mitigation Measures HAZ-3 through HAZ-6 are imposed to reduce impacts associated with the use of hazardous materials for construction of the intake and discharge pipes. Each mitigation measure requires future preparation of a plan that the Draft EIR concludes would reduce impacts to less than significant. Pursuant to the mitigation measures, these plans must include minimum informational items. They do not, however, provide adequate minimum measures or performance standards to ensure that impacts would be mitigated to less than significant or to allow the public to understand how these mitigation measures are effective. Please supplement these mitigation measures or explain how future preparation, review, and approval of these plans is adequate.

MBCH3-62

As previously noted, the impacts associated with the Regional Project are analyzed only in comparison to the impacts of the Local Project. The Hazards and Hazardous Materials section does not substantiate its basis for not analyzing these impacts for the Project as a whole—i.e., the Local Project and the Regional Project. Treating the Local Project and the Regional Project as two separate projects does not adequately inform the public of the project's full environmental effects and ignores the potential for the hazardous materials of one portion of the project to exacerbate those of the other portion of the project.

MBCH3-63

K. Hydrology and Water Quality

The Hydrology & Water Quality section explains that currents run counterclockwise from the south to the Channel Islands. There is no analysis of potential impacts when concentrated brine collects within this countercurrent or the potential for the brine to impact the Ballona Wetlands as the current directs the concentrated saltwater to the north.

MBCH3-64

Further, as identified in the Hydrology & Water Quality section, the lowest salinity levels are at the terminus of Ballona Creek about two miles to the north. The countercurrent flows north from the brine discharge points to the terminus of Ballona Creek. But because this terminus is outside of the marine study area, there is no analysis of potentially elevated salinity levels and its impacts on differing species inhabiting the marine area near the terminus of Ballona Creek. Please expand

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the scope of analysis to consider species in the area of Ballona Creek and the wetlands, as there is a strong likelihood that concentrated brine could flow north to lower salinity waters where species may be present that are more intolerant to high salinity.

↑ MBCH3-64

The Draft EIR claims that subsurface water intakes were found to be infeasible for the proposed project based on the composition of the sea floor. The Draft EIR fails to provide substantial evidence that it is infeasible although the California Ocean Plan requires subsurface water intakes unless they are infeasible.

↓ MBCH3-65

This area of the Santa Monica Bay is listed as impaired for debris, sediment toxicity, DDT, and PCBs; and the project would result in the discharge or release of additional contaminating properties into the water. The EIR appears to determine that the impacts associated with the project's release of contaminants into the water are less than significant because the project is mandated to comply with applicable water quality standards. In addition, it claims that discharge "would not increase the total load of constituents in Santa Monica Bay." Given that the project will result in the release of contaminants, including brine, please explain how the project will result in no increased contaminants. In addition, it is unclear whether the brine discharge and increased salinity levels could exacerbate the effects of the existing contaminants in the impaired water body. The Draft EIR should identify how any of the existing or new contaminants would interact.

↓ MBCH3-66

The Draft EIR claims that stainless steel wedgewire screens are not necessary because West Basin has fully quantified the potential impacts of copper leaching (p. 5.9-57, fn. 23). However, no full quantification is provided in the Draft EIR. Rather, the Draft EIR correctly notes that copper dissolution in marine environments has not been extensively evaluated. Nonetheless, the Draft EIR concludes, without support, that instantaneous copper concentrations would not exceed limits. Because the evidence provided for this determination is based on speculative and unsupported premises, this impact is potentially significant. West Basin should consider, through the Draft EIR's environmental analysis, the use of stainless steel wedgewire as a less impactful alternative similar to the wedgewire selected by the proposed desalination facility in Huntington Beach.

↓ MBCH3-67

Table 5.9-6 indicates that the salinity increment for the Local Project is 1.9 ppt at near field, which is 0.1 below the threshold salinity increase at the BMZ boundary. Table 5.9-8 shows that the salinity increment for the Regional Project is 1.7 ppt at near field. This 1.7 ppt increment is measured against the baseline salinity levels that would be established by the Local Project. The Draft EIR must analyze the salinity of the Local Project plus the Regional Project from current environmental conditions (i.e., current salinity levels). By assessing the Regional Project from a Local Project's future baseline, the Draft EIR disguises the whole project's impacts to salinity levels. It is unclear from the Draft EIR's analysis whether the Local Project and the Regional Project would together exceed the threshold of 2.0 ppt at the BMZ boundary because the analysis calculates future salinity levels at the near field closer to the discharge point. However, the whole of the project would exceed a 2.0 ppt increment at near field.

↓ MBCH3-68

Basing the environmental analysis of the Regional Project on the analysis of the Local Project is also problematic because it assumes that the impacts of the Regional Project, as measured from the future baseline of the Local Project, would be similar to the impacts of the Local Project. This assumption is not supported and fails to account for compounding water quality impacts and

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biological stress thresholds. Please revise the Draft EIR to examine the total impacts of the project from current baseline conditions accounting for any compounding effects.

MBCH3-68

The Draft EIR notes that dewatering will occur in a “no pump zone” where there is contaminated groundwater. Because this groundwater would not otherwise be used, this dewatering would not result in the depletion of usable groundwater. The EIR does not discuss where the contaminated water, once extracted, will be exported. Is there a potential for the contaminated water to contaminate non-contaminated groundwater?

MBCH3-69

The Draft EIR does not address the potential for groundwater to be contaminated with ocean salt water. Based on the proximity of the dewatering activities to the ocean, is there a potential for salt water to contaminate groundwater during excavation or dewatering?

MBCH3-70

There are potential impacts due to the decreased elevation of the project site compared to sea levels, which could expose people to risks associated with flooding, tsunamis or wave run-up. The project would exacerbate these conditions because it would grade the site to a lower elevation. According to the Draft EIR, Mitigation Measure HYDRO-1 reduces impacts to less than significant. But Mitigation Measure HYDRO-1 does not impose any specific measures, and the Draft EIR does not explain how the types of measures developed later will reduce impacts. Instead, it requires a Coastal Hazard Resiliency Plan and requires specific information to be included. It does not, however, require any specific minimum requirement or a defined, quantifiable performance standard. Because Mitigation Measure HYDRO-1 lacks any specific measures or performance standards against which to base its efficacy, reliance on Mitigation Measure HYDRO-1 constitutes impermissible deferred mitigation.

MBCH3-71

The Draft EIR fails to analyze the potential flooding impacts of the whole of the project, i.e., the Local Project and the Regional Project together. As a result, the Draft EIR does not examine the combined flooding risks from grading and reducing the elevation of the entire site. Further, Mitigation Measure HYDRO-1 is required to reduce the impacts of the Regional Project because the environmental analysis of the Regional Project is based on that of the Local Project. But, it is unclear how this Mitigation Measure would apply to the Regional portion of the project.

L. Land Use and Planning

Under the LCP and the Coastal Zone Specific Plan Map, the site is designated Power Plant (“PP”), which is limited to “energy facility and energy related development required for the continued operation of the electrical power plant.” Further, page 28 of the Specific Plan defines the uses allowed in the PP area, and these uses include an electrical generating station, along with accessory uses. It does not include a desalination plant or any broader category of use within which such a facility would fit.

MBCH3-72

Moreover, the LCP and the Coastal Commission’s findings identify that this site is “fully utilized, would support only modifications to the existing electrical power plant, and would be limited to energy related development.” The project is inconsistent with the LCP and therefore with the Coastal Act.

M. Marine Biological Resources

Section 5.8 (Hazards and Hazardous Materials) correctly identifies that construction of the screened ocean intake and concentrate discharge would involve the use of marine fuel and other hazardous construction materials such as oils, lubricants, paints and thinners, solvents and cleaning agents, degreasers, glues and adhesives, cement and concrete, and asphalt mixtures. The Marine Biological Resources section does not directly address the levels of these hazardous materials that could potentially leak into the ocean in the vicinity of the intake and discharge as compared to the levels that could impact marine species. Section 5.8 addresses protections against accidental fuel releases or spills. Neither Section 5.11 nor 5.8 addresses any concomitant leaching or leaking that occurs with the use of the above construction materials.

MBCH3-73

The California Ocean Plan identifies subsurface intakes as the environmentally preferred technology and requires the use of this technology unless it is infeasible, as determined by the Regional Water Quality Control Board (“RWQCB”). In the event that subsurface intakes are infeasible, then screened ocean intakes may be considered. The project proposes use of the existing ocean intakes, which are not subsurface, and the EIR does not identify whether subsurface intakes were found to be infeasible. Because the use of subsurface intakes is environmentally preferred and generally required, the Draft EIR should be revised to analyze the feasibility of installing subsurface intakes and identify whether the RWQCB has found them infeasible here. In the event that the California Ocean Plan will require subsurface intakes, the impacts of constructing the intakes need to be analyzed in the EIR.

MBCH3-74

The California Ocean Plan also requires the project to comingle brine discharge with an existing wastewater discharge point to dilute the brine before final discharge into the ocean. The project proposes the use of multipoint diffusers, which is the next best method for discharging brine (as identified on page 5.11-9). However, the Draft EIR does not examine whether the environmentally best option—discharge into wastewater—can be implemented. Without an examination of and determination of wastewater feasibility, the project is inconsistent with the California Ocean Plan.

MBCH3-75

The marine study area extends approximately one nautical mile upcoast and downcoast of the intake and discharge terminus points and approximately 1.5 nautical miles offshore from the beach. What is the scientific basis for selecting this study area? The Draft EIR fails to provide adequate scientific basis for narrowly defining the study area, and unduly limiting the scope of the analysis. Further, the study area appears to exclude the area in which the Hyperion Treatment Plan deep water discharges, and thus provides no analysis of the cumulative impacts associated with the discharges.

MBCH3-76

In limiting the study area, West Basin evades any discussion of potential impacts to the Marine Protected Areas in and near the Santa Monica Bay, such as the Abalone Cove State Marine Conservation Area, Point Vicente State Marine Conservation Area, Point Dume State Marine Conservation Area, and the Mugu Lagoon to Latigo Point Area of Special Biological Significance.

By selecting this study area, the Draft EIR also limits its biological impact analysis to only those species found to be located within it. Is there a potential that species living further up or down the coast, or in deeper waters, could be impacted by brine discharge either directly or indirectly? For example, are there species inhabiting the area near the terminus of Ballona Creek that may be more

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sensitive to salinity level increases? The EIR also asserts that the dispersal of ocean species from the intake/discharge points during construction and operations alleviates risks to these species. Are there species that typically inhabit areas outside the study area that depend on the location of species within the study area?

MBCH3-76

There is critical habitat located less than 2.5 miles to the north of the project site. Because it is not located in the self-designated study area, impacts to this habitat and to the snowy plover are not analyzed. Any basis for limiting the study area to a one-mile radius should demonstrate that there are no potential impacts to this critical habitat and the snowy plover. The Draft EIR provides no analysis for the public to understand whether the critical habitat or snowy plover would be directly or indirectly impacted either by a change in species distribution or due to sensitivity to the project's discharge.

MBCH3-77

Approximately eight acres in total of the seafloor would be disturbed in the area located approximately 0.5 nautical miles offshore. In this area, pile driving would also occur during construction that cause noise and vibration. However, the Draft EIR does not analyze the noise and vibration levels that would result. Instead, study of these marine impacts are deferred to the study required by Mitigation Measure BIO-M1. Because study of these impacts are deferred, the Draft EIR fails to provide the necessary facts and information to review the study findings or potential impacts to species in the vicinity.

MBCH3-78

Additionally, the study required in Mitigation Measure BIO-M1 requires certain BMPs if the study finds that noise exceeds standards, including 120 db at 500 meters. Harassment impacts to species occur when the species experiences levels of 120 dBrms for non-impulsive and 160 for impulsive. What is the rationale for considering only impacts on species located within 500 meters? If the rationale is that species will disperse from a 500-meter area due to the initial noise disturbances, why are these initial behavioral disturbances not considered significant and what are the indirect impacts of this dispersal and on species migration?

Due to the Draft EIR's defined study area, there is no analysis related to species inhabiting the Ballona Wetlands or the ocean areas at the terminus of the Ballona River. Given ocean currents, could brine discharges directly or indirectly impact species in the Ballona Wetlands located 3.75 miles away?

MBCH3-79

The Draft EIR's analysis of the salinity increment is based on a baseline salinity level of 33.5 ppt (see page 5.11-11.) The basis for this background salinity level is a study from 1993. Has the background salinity level been confirmed at the time of the Notice of Preparation? Similarly, surveys of the sandy beach intertidal areas were completed well over a decade ago in November 2006 and May 2007, studies of Demersal Fish were most recently completed a decade ago; and several other studies are five or more years old. More current surveys of the existing marine habitats and communities are necessary to adequately establish the current baseline, which is required for an adequate assessment of the project's potential impacts.

MBCH3-80

Table 5.11-3 references white shark, concluding that the species is "Not Expected to Low", however more recent studies have shown that the warmer waters in the Santa Monica Bay, including waters near Manhattan Beach, serve as nurseries for white sharks. The Draft EIR fails to discuss this presence and whether there would be impacts to these shark nurseries or sharks in

MBCH3-81

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the study area. Many species in Table 5.11-4 are listed as threatened or as California species of special concern with a low probability to occur in the study area. The Draft EIR omits these species from consideration as species that may be impacted due to this low probability and asserts that only two of these protected species have “any probability” of occurring in the study area. Further, these occurrences are based in part on outdated surveys from 2001 and 2008 and, given increasingly rapid marine conditions, may be out of date and no longer relevant. Please update the analysis to fully analyze impacts to all protected species and verify species occurrences with updated surveys.

↑ MBCH3-81

MBCH3-82

The Draft EIR states that “[p]ile driving using either vibratory or impact hammers could result in underwater noise which can be harmful to both fish and marine mammals” (p. 5.11-39). Further analysis of the specific impacts on migrating whales is necessary and should take into account recent studies by Ted Cranford, a whale biologist at San Diego State University, who studies noise impacts on whales.

MBCH3-83

The Draft EIR states that vessels used in construction are expected to originate from the Port of Los Angeles or Port of Long Beach (p. 5.11-39). This statement, however, is inconsistent with other statements that some of the vessels may originate from Marina Del Ray. The origination location must be clarified and impact analysis updated accordingly based on where the vessels will originate.

MBCH3-84

The recovery period for species to repopulate their prior habitat is estimated at a few months to less than two years based on studies from 1996 and 1998. Since 1998, other desalination projects have been approved and constructed, which would provide more up-to-date information on repopulation after similar construction activity. Further, it is assumed in the Draft EIR that these species will disperse; but there is no substantial evidence to support such dispersal or that it will occur fast enough to prevent mortality or harassment.

MBCH3-85

Dredging of sediments during construction has the potential to entrain fish and mobile epibenthic invertebrates. The impact analysis on potential entrainment impacts reaches a less than significant impact determination on the premise that fish will be able to swim free once the dredged sediments are placed on the sea floor. However, there is no corresponding analysis regarding impacts to bottom dwelling species, which could be trapped in or under the dredged material.

MBCH3-86

The impacts of increased turbidity levels are determined to be less than significant with the implementation of standard BMPs. However, the Draft EIR does not identify which of these BMPs will be implemented; and no mitigation measure mandates implementation. A less than significant determination cannot rely on BMPs that may or may not be required as part of project implementation.

MBCH3-87

Further, it is estimated that “losses of 1 to 2 percent of the source water populations for the majority of taxa analyzed” would result from entrainment (Draft EIR, p. 2-33). There is, however, no analysis or consideration of how an up to two percent loss of larvae year after year could impact the studied species over the long term.

MBCH3-88

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According to *Overview of Desalination Plant Intake Alternatives* (WaterReuse Association, 2011; found at: https://watereuse.org/wp-content/uploads/2015/10/Intake_White_Paper.pdf) “Wedge-wire screens are cylindrical metal screens with trapezoidal-shaped ‘wedgewire’ slots with openings of 0.5 to 10 mm. They combine very low flow-through velocities, small slot size, and naturally occurring high screen surface sweeping velocities to minimize impingement and entrainment. These screens are designed to be placed in a water body where significant prevailing ambient cross flow current velocities (≥ 1 fps) exist. This high cross-flow velocity allows organisms that would otherwise be impinged on the wedge-wire intake, to be carried away with the flow.” (Id. at p. 14.) The Draft EIR analysis, however, does not provide any evidence to show that currents in the Santa Monica Bay will provide sufficient cross flow velocities to reduce impingement.

MBCH3-89

The Draft EIR determines that impacts related to impingement would be less than significant and provides: “Based on video surveys and water sampling of a pilot-scale ocean intake fitted with 1 mm (0.04 inch) or 2 mm (0.08 inch) slot size wedgewire screens and an intake velocity of 0.5 fps, Tenera (2014) determined that impingement of all motile marine organisms would be reduced to zero. As a result, impingement of larval fish or invertebrates would not be expected to occur from the Project[.]” This survey involved a “pilot-scale ocean intake.” At full operational scale, what is the basis for assuming that impingement would be similar to this pilot-scale intake? Does the chance of impingement increase either (a) when the intake size is greater or (b) when there is more than one intake in the immediate area?

MBCH3-90

The Draft EIR’s analysis of entrainment determines that entrainment would not be significant because the 1 mm wedgewire screen is small enough to prevent intake of species greater than 2 mm. Please clarify how this screen design also prevents impingement of species greater than 2 mm.

MBCH3-91

The Draft EIR’s analysis of impacts related to increased salinity levels does not assess potential impacts on larvae or small organisms such as plankton. Is there a scientific basis for assuming that increased salinity does not have a greater impact on these immature and small ocean species?

MBCH3-92

The Draft EIR notes that shear turbulence would most impact organisms of a size smaller than 1 mm. These impacted organisms are the same organisms that are most impacted by intake impingement and entrainment. However, the Draft EIR does not analyze and calculate the total mortality of these impacts that would result from all type of project impacts from turbulence to impingement and entrainment. The Draft EIR must assess the total mortality of these organisms from all impact causes. By segmenting the mortality analysis into discrete causal categories, individual impacts appear less significant than the total impact of the project would cause.

MBCH3-93

As previously noted, the California Ocean Plan requires, wherever feasible, that the brine discharge be mixed with the output of an existing wastewater source, such as municipal water discharge or sewers. The Draft EIR does not consider this as a potential project feature or as mitigation. Based on the comments above, there is a likelihood that the project would result in unmitigated significant impacts. As such, use of an existing wastewater discharge point must be considered as a feasible mitigation measure.

MBCH3-94

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The Draft EIR concludes that the Regional Project would not have any significant impacts on the basis that the Regional Project's components are similar to those of the Local Project. This analysis fails to consider the total operational intensity of the Regional Project from current baseline conditions. For example, the salinity increment of the total project could exceed the 2.0 ppt threshold when analyzed from current conditions. The analysis of the Regional Project appears to consider the impacts of the Regional Project as measured from a scenario where the Local Project is already operational.

MBCH3-95

N. Noise

The South Site is 130 feet from Manhattan Beach residential uses. Noise levels from pile driving would be approximately 93 dB at this distance. As noted in the Draft EIR, Manhattan Beach's noise ordinance exempts "reasonable daytime construction noise." The Draft EIR omits that reasonable daytime construction noise is exempt only if construction adheres to the provisions of Manhattan Beach Municipal Code Chapter 9.44. The Project is located outside of Manhattan Beach's jurisdictional boundaries, and West Basin has not indicated that it will mandate compliance with Chapter 9.44. Thus, the Project's construction noise is not exempt from Manhattan Beach's noise threshold standard under Section 5.48.250 unless and until West Basin mandates compliance with Chapter 9.44. Compliance may include limiting construction hours or other discretionary measures where noise impacts are significant.

MBCH3-96

Further, construction noise is expected to occur for a total of 108 months (72 months for the Local Project and an addition 36 months for the Regional Project) with pile driving occurring for a total of seven months (three months for the Local Project and four months for the Regional Project). This duration of noise at sensitive receptors in excess of 90 dB is not reasonable and additional mitigation is necessary.

MBCH3-97

Further, West Basin has not demonstrated that it has implemented all feasible mitigation to reduce significant noise impacts. First, construction projects routinely implement noise-mitigating measures such as noise walls, shields, or blankets to physically block noise transmission. Projects with significant noise impacts also use drilling to avoid significant noise impacts during construction. Second, the mitigation measure offered lacks sufficient specificity for enforcement or the public's understanding of its requirements. Mitigation Measure NOI-3 lacks sufficient specificity for enforcement as it merely requires West Basin to "determine the feasibility of using" certain noise-reducing construction methods. It does not require any specific measures to reduce noise and constitutes impermissible deferred mitigation because it defers the identification of specific measures and their feasibility to a future study.

MBCH3-98

Mitigation Measure NOI-5 requires West Basin to evaluate whether vibration impacts from pile driving would damage the Chevron storage tank. This analysis should be included in the Draft EIR and should not be deferred. Further, Mitigation Measure NOI-5 does not provide specific measures required if the deferred study concludes that damage could occur. If damage were to occur to the tank, the risks of that damage would implicate the release of hazardous materials. The Draft EIR must analyze the potential for such damage to inform the public of potential environmental harms and environmental hazards.

MBCH3-99

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Ambient noise impacts on nearby residential uses in Manhattan Beach are not analyzed in Section 5.12. Instead, the Draft EIR concludes that acoustical treatments are sufficient to maintain noise levels below Manhattan Beach’s thresholds because “compliance with the noise ordinance standards would require that the facility control noise sources to levels below existing ambient levels” of 59.3 dBA Leq. The Draft EIR must analyze whether adherence to noise standards and thresholds would in fact occur by assessing anticipated noise levels (with the proposed acoustical treatments) at nearby sensitive receptors. This information is also necessary for public disclosure of the project’s noise impacts on the nearby community. Without this analysis, it is not possible for the public to assess the project’s noise impacts until the project is constructed and operational; CEQA mandates analysis of these environmental impacts at the EIR stage.

MBCH3-100

The environmental analysis for the Regional Project on page 5.12-30 fails to analyze the total noise levels of the Local and Regional Projects when both are operational. The Draft EIR must disclose the whole project’s noise impacts on nearby sensitive receptors in the adjacent residential community.

MBCH3-101

O. Recreation

The Draft EIR discusses the potential impacts of the pump station(s) necessary for the desalinated water conveyance system, stating that the “approximately 5,000-square-foot pump station sites would remove some areas of existing parks from public use, but once constructed would not substantially reduce the availability of recreational facilities in the community.” (p. 5.14-10.) Based on this superficial analysis, which does not appear to take into account input from the agencies with jurisdiction over the park areas, the Draft EIR concludes that the impacts will be less than significant. While “only small portions of existing public space would be committed to the pump station,” accommodation of water supply projects should not supersede other policies related to the provision of adequate park and recreation facilities for the public. It is also unclear how conclusions about impacts can be reached when there has not been detailed analysis of the potential sites. Further, at a minimum, the Draft EIR should discuss replacement of lost park space.

MBCH3-102

Mitigation Measure REC-1 references coordination with local agencies and local approvals; however, the project description does not specifically identify these local approvals. Further, the mitigation measure defers the identification of the ways in which construction activities could be “minimized during peak-use periods for impacted facilities....” (p. 5.14-11.) The mitigation measure also discusses restoring bicycle facilities to their original condition but provides no details about whether bicycle facilities will be rerouted during the construction period to avoid closures of other impacts that would restrict use of the facilities for recreational and transportation purposes.

MBCH3-103

MBCH3-104

Analysis of construction related impacts for the Regional Project states that construction or expansion of recreational facilities will not be required (p. 5.14-13). This unsupported conclusion does not address the potential need to reroute the beach bike path away from the construction site due to noise, air quality, or other construction-related impacts. The same is true of construction impacts to bike facilities and parks as a result of the desalinated water conveyance facilities.

MBCH3-105

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P. Transportation and Traffic

The Draft EIR includes (pp. 5.15-7 through 5.15-8) a listing of Manhattan Beach General Plan goals and policies applicable to the projects by virtue of the proximity to 45th Street. Yet, there is no analysis of consistency (or lack thereof) with these General Plan goals and policies. Please revise to provide this analysis.

MBCH3-106

The Draft EIR concludes that the Local Project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities (Impact TRA 5.15-6), but acknowledges that “construction activities would occur adjacent to the [Marvin Braude Coastal] bike trail for several weeks.” (p. 5.15-33.) Does this mean that over the entire five-year construction period for the Local Project, West Basin commits that the trail would be impacted for only “several weeks” in total? How would the Local Project not decrease the safety of the bike trail if riders are forced onto the sand in the sections where the trails are to be closed?

MBCH3-107

The project description states that construction worker trips “would be expected to occur before 7AM in the morning and either before 4PM or after 6PM in the afternoon and would therefore occur outside of the peak traffic hours...” (p. 3-18.) Mitigation Measures TRA-1 and TRA-2 do not require construction worker trips to be during the above noted peak hours, and thus there is no assurance that the “expectations” relied upon in the Draft EIR are realistic or will be followed. Thus, specific mitigation prohibiting construction related trips from occurring during peak periods must be incorporated into the mitigation measures.

MBCH3-108

Q. Utilities and Service Systems

The Draft EIR includes several references to potential connection to the Manhattan Beach sewer system. (See, e.g., p. 5.16-16). Please note that the City of Manhattan Beach has not agreed to any such connection at this time and would require a full analysis of project impacts that addresses each of the comments set forth in this letter before it would consider approving such a connection.

MBCH3-109

R. Other CEQA Considerations

The Draft EIR states that the water generated by the project “would replace (a portion of) existing imported water... and therefore would not be growth inducing” (pp. 6-5; 6-7, 6-8). The Draft EIR does not, however, explain the why the additional water generated from the project could not be added to the existing imported water. The Draft EIR does not identify any impediment to a future District Board deciding to continue to get as much imported water as possible in addition into the desalinated water, in which case the expanded water supply in the area would likely induce growth. The Draft EIR must be revised to consider these types of impacts, and if the intent is to replace existing imported water, the project approval must have a legally enforceable condition requiring the replacement to preclude the potential growth inducement.

MBCH3-110

Tellingly, and contrary to the assertions that the desalinated water will replace existing imported water, the Draft EIR admits that project “would be implemented in phases *to ensure the new supply is appropriately keeping up with population growth*” (p. 6-9, emphasis added). This admission suggests that the true intent is not simply to replace imported water, but is clearly intended to expand water supplies to accommodate (or induce) continued population growth. As such, further analysis is required of the project’s removal of water constraints by increasing water

Comment Letter CITY OF MANHATTAN BEACH3

availability and the future development and population that will be accommodated by removing the water constraints, as well as the implications of this concession in other environmental impact areas such as GHG emissions, which are expressly premised on the reduction of imported water.

MBCH3-110

S. General Comments

The project description mentions that the decommissioned NRG Units 3 and 4 would need to be demolished in conjunction with use of the North Site. While some of the sections in the Draft EIR discuss the potential demolition impacts, others seem to ignore this significant aspect of the North Site. Further, because much of the construction analysis conflates the North and South Sites, the Draft EIR fails to disclose the difference in construction-related impacts between the North and South Sites. See, for example, the Local Project construction-related recreation impacts, where the analysis covers both the North and South Sites. The discussion states that “the construction activities involved with the demolition of the ESGS Units 3 and 4” are included; however, the demolition impacts of the North Site differ considerably from those associated with the South Site. This is a global comment and should be addressed in each subsection of Chapter 5 of the Draft EIR when discussing construction impacts, otherwise the difference in environmental impacts between the North and South Sites is not adequately disclosed.

MBCH3-111

III. The Draft EIR Fails to Consider Feasible Alternatives and Analyzes Ineffective Alternatives

In addition to the identified alternatives, the Draft EIR should include an analysis of an alternative that combines the brine discharge with the discharges of the Hyperion Water Reclamation Plan, which is the preferred method of reducing the salinity of the brine from the desalination project before putting it back into the ocean. The Hyperion facility is located in relatively close proximity to the project site and connecting the outflow activities between the two facilities would reduce potential impacts, and would further the Ocean Plan amendments. The Draft EIR should be revised to study this additional alternative.

MBCH3-112

It is unclear why the Layout Alternative: Reduced Elevation - ESGS South Site Plan Alternative was included for analysis when it does not address or reduce any of the potentially significant environmental impacts. As such, the Draft EIR should be revised to include more alternatives that actually could reduce one or more of the potentially significant impacts identified in the Draft EIR.

MBCH3-113

The Draft EIR’s discussion of the environmentally superior alternative focuses in large part on a comparison of the North Site and South Site, although both of those sites were considered in the Local Project analysis throughout the EIR. Calling the North Site the environmentally superior site, although neither the North Site nor the South Site was analyzed as an alternative, undermines the Draft EIR’s alternatives analysis. While the City does acknowledge that the impacts of the North Site likely are less than those on the South Site, a revised Draft EIR addressing all of the comments identified herein, including consideration of different alternatives, must be completed before an environmentally superior alternative can truly be identified.

MBCH3-114

Comment Letter CITY OF MANHATTAN BEACH3

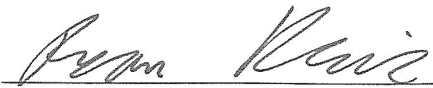
IV. Conclusion

Based on the foregoing, the City of Manhattan Beach requests that appropriate additional environmental analysis and Draft EIR updates and revisions be completed, and that the Draft EIR be recirculated for additional public review and comment before the District considers the EIR for certification or takes any action on the project.

MBCH3-115

Please do not hesitate to contact us with any questions.

Very truly yours,


Anne McIntosh
Director of Community Development
City of Manhattan Beach

Ryan Heise
FOR ANNE MCINTOSH

Comment Letter REDONDO BEACH



Bill Brand Mayor	415 Diamond Street, P.O. BOX 270 Redondo Beach, California 90277-0270 www.redondo.org	tel 310 372-1171 ext. 2260 fax 310 374-2039
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May 8, 2018

West Basin Municipal Water District
17140 South Avalon Boulevard, Suite 210
Carson, CA 90745
Patrick Shields, General Manager

Environmental Science Associates (EIR Preparation)
626 Wilshire Boulevard, Suite 1100
Los Angeles, California 90017
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.

RBCH-1

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.

RBCH-2

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.

West Basin Letter and DEIR Comments

Page | 2

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.

RBCH-3

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.

RBCH-4

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.

RBCH-5

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

RBCH-6

Sincerely,



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. RBCH-7

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. RBCH-8

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. RBCH-9

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. RBCH-10

5. Page 4-6-The related projects list No. 24 should specify the 1700 PCH project as 115 units. Construction would begin in 2019. RBCH-11

- 6. Page 4-6- The related project list No. 25 should be revised to show that the project is under construction. RBCH-12

- 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. RBCH-13

- 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. RBCH-14

Thank you again for the consideration of our comments.



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

John Wicker, Director

Norma E. Garcia, Chief Deputy Director

May 24, 2018

Ms. Zita Yu, PhD, PE
Program Manager
West Basin Municipal Water District
17140 South Avalon Boulevard
Carson, CA 90746

Dear Ms. Yu:

**NOTICE OF AVAILABILITY OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
OCEAN WATER DESALINATION PROJECT**

Thank you for the opportunity to review the Draft Environmental Impact Report (EIR) for the West Basin Ocean Water Desalination Project (project) which consists of the construction of an ocean water desalination facility, an ocean water intake system and brine discharge system, and a desalinated water conveyance system. The Draft EIR has been reviewed for potential impacts on facilities operated and maintained by the Los Angeles County Department of Parks and Recreation (DPR). One of the three alternative sites for the development of a regional pump station is a DPR facility known as the Chester Washington Golf Course (Golf Course) at 1930 West 120th Street., Los Angeles, CA 90047

The Golf Course is an 18-hole facility located in the unincorporated community of West Athen-Westmont's and serves as one of the largest green spaces in the area. The Golf Course is public, but there are fees to use the course or to hold events at the facility. The Golf Course is bordered to the south by El Segundo Boulevard, to the east by Western Avenue, to the west by Van Ness Avenue, and to the north by a rail corridor operated by Southern Pacific Rail.

The Draft EIR for the project has been reviewed for the potential impacts to the Golf Course. The document should explain how the proposed 5,000-square-foot site would be acquired, accessed and used. Please provide more details on the regional pump station building and accessory structures. The DEIR must be revised to include details on the construction and operation of the regional pump station, or a supplemental document should be prepared at a later date in order for the public and decision-makers to be fully apprised of the project's potential environmental impacts. If the Golf Course site was selected for the development of the regional pump station, the project may

LADPR-1

Ms. Zita Yu
May 24, 2018
Page 2

have the following impacts:

↑ LADPR-1

Park Preservation Act

Public accessible green space is extremely limited in the community of West Athens-Westmont. The Golf Course is one of the largest green spaces in the area. Construction of a regional pump station on park property may have implications with respect to the Park Preservation Act by reducing the amount of green space available for public enjoyment. Per the Park Preservation Act, compensation would be required to off-set the loss of park land/open space.

LADPR-2

Historic Resources

DPR has prepared a cultural assessment for the Golf Course (see enclosed), but it has not been filed with the South Central Coastal Information Center. This information should be reviewed and included in the cultural resources analysis if the Golf Course is selected for the project. The entire Golf Course and its buildings are eligible for the California Register of Historic Resources. Please provide DPR a copy of any archaeological report that is generated from monitoring work performed on the Golf Course property.

LADPR-3

Golf Course Reconfiguration

The project may necessitate narrowing and reconfiguration of the hole adjacent to Van Ness Avenue, as well as eliminating a practice pitching area adjacent to the maintenance yard. The project may also have the potential of removing several ornamental trees. Trees that are being removed should be replaced on-site and the project proponent should coordinate with DPR on the type and number of trees to be replaced.

LADPR-4

Aesthetics and Maintenance Yard Access

Construction and operation of the proposed project may create an eyesore on the golf course. The project proponent should coordinate with DPR on the design of the facility. Construction activities for the proposed project may also affect the access to the Golf Course maintenance area. The project proponent should coordinate with the Golf Course operator to develop safety measures for the construction and on-going operations of the pump station.

LADPR-5

Marvin Braude Bicycle Path

Project Description, Page 3-41: Please revise the second-to-last row regarding "L.A. County Parks." Per the County's "Bicycle Master Plan", the Marvin Braude Bicycle Path is maintained by Los Angeles County Department of Public Works, and this would be the correct agency to request an encroachment permit, not DPR.

LADPR-6

Recreation, Page 5.14-6: Revise eighth bullet point to read as follows: "Regional Pump Station Optional Site 5, which is sited within the westernmost edge of the Chester

LADPR-7
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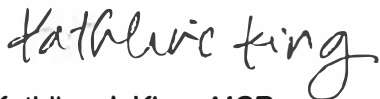
Ms. Zita Yu
May 24, 2018
Page 3

Washington Golf Course in unincorporated Los Angeles County.”

↑ LADPR-7
|
| LADPR-8

Thank you for including this Department in the review of this document. For golf operations inquiries, please contact Mr. Jorge Badel at (626)821-4649 or jbadel@parks.lacounty.gov. For any other inquiries, please contact Ms. Jui Ing Chien of my staff at (626) 588-5317 or jchien@parks.lacounty.gov

Sincerely,



Kathline J. King, AICP
Chief of Planning

KK:JIC:jic

Enclosure

c: Parks and Recreation (B. Ruiz-Hoffmann, J. Badel, C. Lau, L. Barocas, B. Moscardini, A. Davies, G. Mason, J. Chien)



Photo Credit: Sapphos Environmental, Inc. 2016

Historical Resource Evaluation for Chester Washington Golf Course

March 2018

Prepared for:
County of Los Angeles
Department of
Parks and Recreation

Prepared by:
Sapphos Environmental, Inc.
430 North Halstead Street
Pasadena, California 91107

EXECUTIVE SUMMARY

Sapphos Environmental, Inc. has determined that Chester Washington Golf Course and its structures meet the criteria to be treated as a historical resource pursuant to Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines. The setting, buildings, and structures retain sufficient historic integrity and meet the criteria for listing in the California Register of Historical Resources (CRHR) and County of Los Angeles Register of Landmarks and Historic Districts (County Register) as a historic district for its association with the integration of golf courses pursuant to Criterion 1, and connection with African-American activists and golfers Maggie Hathaway, Charles Sifford, and Ted Rhodes pursuant to CRHR and County Register Criterion 2. Although named after newspaper magnate Chester Washington, he spent little time in the park; therefore, the park does not qualify pursuant to Criterion 2. The period of significance is from 1954 to 1967 when the golf course was constructed and notable African-American golfers were active at the site.

Chester Washington Golf Course is a property with exceptional historical significance as the site of an important political and cultural event in the history of the African-American golfers in the state of California. Originally named the La Avenida Golf Course, then-known as the Western Avenue Golf Course, the facility served as the first major golf facility to be integrated after racial discrimination. Previously hosting a Caucasian-only golf club, Western Avenue Golf Course was forced to diversify their golf course, opening it to minority players after the County of Los Angeles purchased it. The golf course later served as a base for many professional African-American golfers. The golf course was renamed in honor of newspaper magnate Chester L. Washington in 1982; Washington was important to the community but not active at the golf course. A number of incredibly notable African-American activists and golfers used Chester Washington Golf Course as a location to force social change. Maggie Hathaway, a noted civil rights advocate, brought attention to the Western Avenue Women's Golf Club when they rejected her bid for membership because she was black. Hathaway fought until the club was exiled from the golf course, formed her own minority golf club, and advocated for an integrated golf course. African-American golfers began to pour into the Western Avenue Golf Course, including notable African-American golfers such as Charles "Charlie" Sifford, Ted Rhodes, and Joe Louis. Many of these golfers were involved at the golf course during the height in their careers, and lauded the facility's inclusive atmosphere.

The determination was made by Sapphos Environmental, Inc. (Ms. Alexandra Madsen) who meets the Secretary of the Interior's *Professional Qualification Standards* for History and Architectural History. The determination was based on a review of published and unpublished literature and a site investigation in 2016. In addition to the significance evaluation, a review of the record search was conducted to ensure that any recorded archaeological sites within or near Chester Washington Golf Course were considered. One archaeological study has been conducted within the golf course boundaries. Six archaeological studies have been conducted exclusively within the 0.25-mile buffer zone. No archaeological resources, as defined in Section 21083.2 of the Public Resource Code, have been previously identified within the park boundaries or 0.25-mile buffer zone.

Although a record search was completed, a Phase I Pedestrian Survey to assess the presence or absence of archaeological resources was not completed. Generally, in existing developed golf courses, native soils will be several feet below grade due to prior excavation and grading activities that were conducted for constructing buildings and structures, irrigation, and landscaping. Projects that can be reviewed pursuant to a CEQA Categorical Exemption would not likely create an unusual circumstance with regard to archaeological resources unless a project requires grading and excavation of native soils not disturbed during construction, maintenance, and operation of the golf course. Any work that involves earth-moving activity in previously undisturbed native soils should be monitored by, at minimum, workers that have received cultural resource training pursuant to a cultural resources management plan and worker education and awareness program.



Photo Credit: Sapphos Environmental, Inc. 2016

Historical Resource Evaluation for Chester Washington Golf Course

March 2018

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Western Avenue Golf Course, Later Renamed Chester Washington Golf Course (1965)
SOURCE: *Los Angeles County CEO Photo Unit, #33270, 1965*

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D County of Los Angeles Department of Parks and Recreation Sources

E DPR 523 Forms

F National Park Service Preservation Briefs

SECTION 1.0
PROPOSED PROJECT

The County of Los Angeles Department of Parks and Recreation requested an evaluation of Chester Washington Golf Course to determine if this property qualifies for treatment as a historical resource as defined in Section 15064.5(a) the California Environmental Quality Act (CEQA) Guidelines. This evaluation will be used to inform advance planning, planning and design, and ongoing operation and maintenance activities at Chester Washington Golf Course. At the time of preparation of this report in 2017, there were no specific capital improvements under consideration for the facility.

SECTION 2.0

LOCATION

Chester Washington Golf Course is located in West Athens, a census-designated place within the City of Los Angeles in Los Angeles County, California. Chester Washington Golf Course is located in the Second Supervisorial District of Los Angeles County, approximately 14 miles south of the Los Angeles Civic Center (Figure 1, *Regional Vicinity Map, Chester Washington Golf Course*). The golf course address is 1818 Charlie Sifford Drive, Los Angeles, California 90047. The golf course occupies approximately 125 (125.4) acres on two parcels owned by the County of Los Angeles (AINs 4057-032-901 and 4057-032-900). Chester Washington Golf Course is located within the U.S. Geological Survey (USGS) 7.5-minute series Inglewood topographic quadrangle in Township 3 South, Range 14 West, Section 11 (Figure 2, *Topographic Map, Chester Washington Golf Course*).

The golf course is located in a transitional area between commercial and residential land uses; there are commercial land uses to the west, and single-family residences to the north, east, and south. The golf course is bounded to the north by Charlie Sifford Drive, to the east by single-family residences and Henry Clay Middle School on S. Western Avenue, to the south by single-family and multi-family residences on El Segundo Boulevard, and to the west by commercial buildings on Van Ness Avenue. Chester Washington Golf Course can be reached from Interstate 110 (I-110), take exit 13 towards El Segundo Boulevard. Travel along El Segundo Boulevard for 12 miles, turn right onto Normandie Avenue, turn left onto West 120 Street, and continue straight to Charlie Sifford Drive. Continue on Charlie Sifford Drive for 0.3 mile to the golf course entrance on the left.

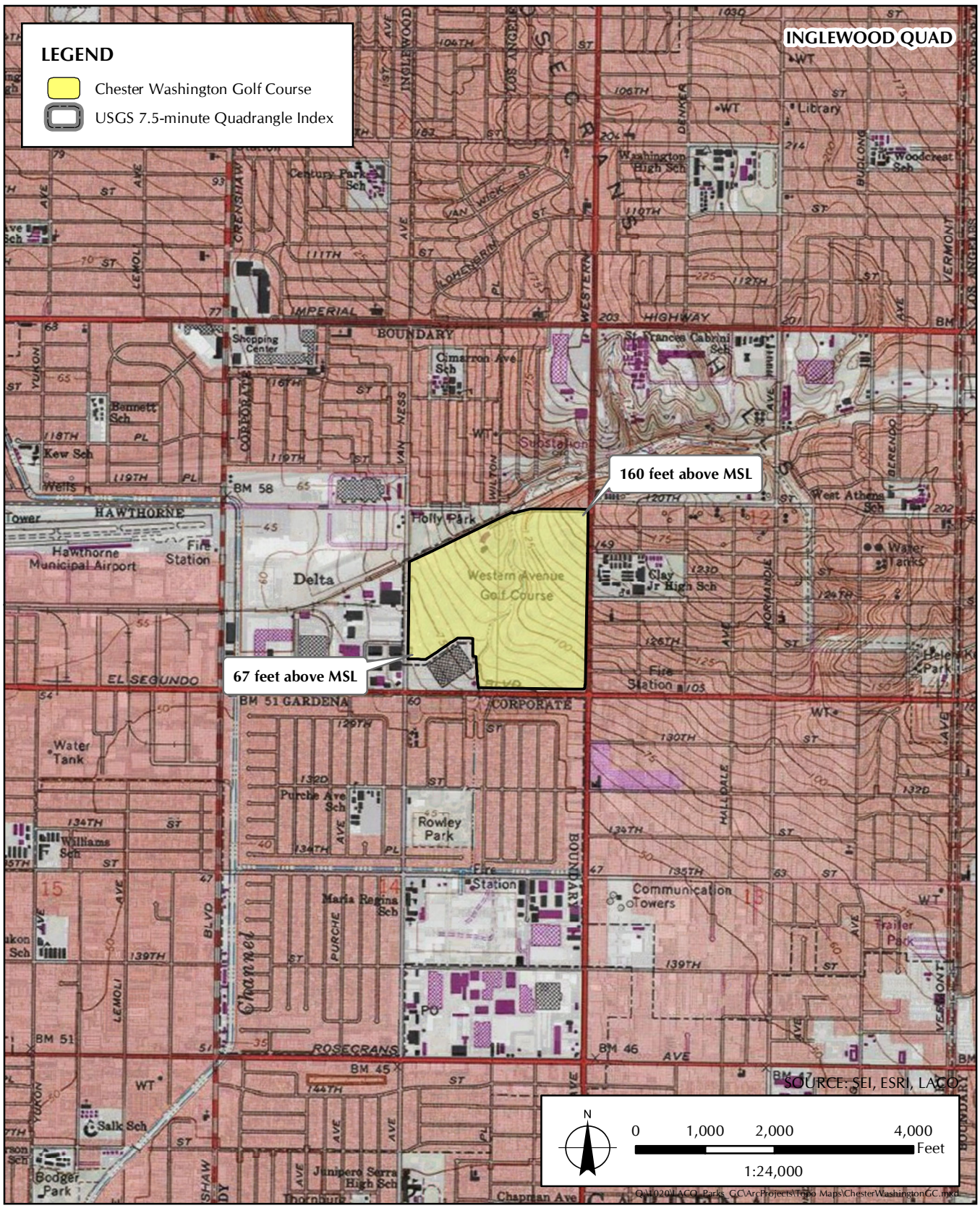


FIGURE 2
Topographic Map, Chester Washington Golf Course

SECTION 3.0

EXISTING CONDITIONS

Chester Washington Golf Course is a public golf course serving the communities of West Athens, Westmont, and Hawthorne.

3.1 TOPOGRAPHY AND GEOLOGY

Chester Washington Golf Course is located in the Coastal Plain of the Los Angeles Central Basin. The Coastal Plain region is characterized by a series of mountain ranges and northwest trending sediment-filled valleys, subparallel to faults branching from the San Andreas Fault. Holocene alluvium forms the natural foundation material underlying the Los Angeles Coastal Plain. The alluvium is typically loose, well drained, moderately sorted, highly permeable sand, gravel, and silt which may be up to 15 feet thick where it overlies bedrock and Pleistocene alluvium. This alluvium is generally fine- to medium- or coarse-grained sand and silty sand with local gravels and clays. Generally, engineering properties range from poor to good; general design values have been developed for the various classes of materials.

Chester Washington Golf Course is gently sloping with elevations ranging from approximately 67 feet above mean sea level (msl) at the southwest corner of the park to 160 feet above msl at the northeast corner of the park.

3.2 SETTING AND LANDSCAPE

Chester Washington Golf Course is an approximately 125-acre community golf course that is 100 percent developed. The golf course was originally constructed between 1926 and 1965 and includes a parking area, hardscaping, a picnic area, and walkways.

Landscape treatments, including lawn areas, shrubs, ornamental tree plantings, and two man-made lakes compose roughly 90 percent (112 acres) of the golf course. The golf course contains a number of mature trees including the following non-native trees: Afghan pine (*Pinus elderica*), Chinese elm (*Ulmus parvifolia*), Deodar cedar (*Cedrus deodara*), fern pine (*Afrocarpus falcatus*), California peppertree (also known as Peruvian peppertree; *Schinus molle*), red river gum (*Eucalyptus camaldulensis*), southern magnolia (*Magnolia grandiflora*), and laurel fig (*Ficus microcarpa*). Mature trees are complemented by grass fields and areas planted with non-native shrubs. The remaining portions of the golf course include building and paved areas.

3.3 BUILDINGS AND STRUCTURES

Chester Washington Golf Course includes banquet facilities, cart rentals, club rental, cocktail lounge, coffee shop, driving range, golf instruction, pro shop, a practice putting green, and a practice chipping green (Table 3.3-1, *Buildings and Structures*; Figure 3, *Existing Conditions Map, Chester Washington Golf Course*).

**TABLE 3.3-1
BUILDINGS AND STRUCTURES**

Building/Structure	Area (Sq. Ft.)¹
Clubhouse	16,669
Gazebo	1,147
Pro Shop	4,270
Plaque	N/A
Storage Shed	128
Maintenance Shed	4,418
Comfort Station No. 1	189
Bridge	27
Comfort Station No. 2	1,442
Concession Stand	1,142
Well House	110
Pump House	691

There are 12 buildings, structures, and features in Chester Washington Golf Course. The buildings, structures, and features that still exist were constructed over a 50+-year period; earlier structures built between 1926 and 1957 were demolished when the County purchase the golf course. Five of these features—the clubhouse, pro shop, bridge, comfort station No. 2, and the concession stand—date to the historic period and were carried forward for detailed evaluation. The gazebo, plaque, storage shed, maintenance shed, comfort station No. 1, well house, and pump house are less than 50 years of age and/or utilitarian or mass produced, and therefore, are not eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or County of Los Angeles Register of Landmarks and Historic Districts pursuant to Criteria A/1, B/2, C/3, or D/4.

¹ Square footages were derived from the Countywide Building Outlines data located on the LACO GIS Data Portal and/or from aerial imagery analysis. Available at: <http://egis3.lacounty.gov/dataportal/2011/04/28/countywide-building-outlines/>



FIGURE 3
Existing Conditions Map, Chester Washington Golf Course

Plaque

Also located at the golf course is a plaque dedicated to Charlie Sifford (Figure 4, *View of Plaque, Chester Washington Golf Course*). The plaque memorializes Charlie Sifford, the first African-American to play in the Professional Golfers' Association (PGA) tour. Sifford frequented Chester Washington Golf Course, which was a refuge for African-American golfers in the Los Angeles area.



Figure 4. View of Plaque, Chester Washington Golf Course
SOURCE: Sapphos Environmental, Inc., 2016

Gazebo

The gazebo is located next to the golf course clubhouse and is commonly used in weddings. This pre-fabricated gazebo has a shingle-clad octagonal roof with exposed rafter tails and is supported by columns with decorative braces. Measuring approximately 1,147 square feet, the gazebo was likely installed in the first decade of the 2000s (Figure 5, *View of Gazebo, Chester Washington Golf Course*).



Figure 5. View of Gazebo, Chester Washington Golf Course
SOURCE: Sapphos Environmental, Inc., 2016

Storage Shed

Used to hold a golf ball dispensing machine, the prefabricated storage shed is located near the putting greens by the pro shop. A gable roof, board siding, and a rectangular floorplan define this 128-square-foot building (Figure 6, *View of Storage Shed, Chester Washington Golf Course*). The building has a vent below the roof to provide passive air flow. The storage shed was likely installed in the first decade of the 2000s.



Figure 6. View of Storage Shed, Chester Washington Golf Course
SOURCE: *Sapphos Environmental, Inc., 2016*

Maintenance Shed

Located in the southwestern region of the park, the maintenance shed is situated near comfort station No. 1. It has a rectangular floor plan, low-pitch gable roof, and wood siding with large, wood barn-style sliding doors that provide an accessible entrance for vehicles. Measuring 4,418 square feet, the maintenance shed was likely constructed circa 1965 but is utilitarian in nature (Figure 7, *View of Maintenance Shed Southern Façade, Chester Washington Golf Course*). Casement windows covered in wire caging line the eastern face of the building (Figure 8, *View of Maintenance Shed Eastern Side, Chester Washington Golf Course*). The building has undergone numerous renovations including the replacement of windows and doors, and is in general disrepair; therefore, it does not retain integrity.



Figure 7. View of Maintenance Shed Southern Façade, Chester Washington Golf Course
SOURCE: Sapphos Environmental, Inc., 2016



Figure 8. View of Maintenance Shed Eastern Side, Chester Washington Golf Course
SOURCE: Sapphos Environmental, Inc., 2016

Comfort Station No. 1

Constructed of concrete masonry units (CMUs) and located in the southwestern region of the golf course, comfort station No. 1 has a rectangular floor plan measuring 189 square feet and a side-gable roof. Two metal doors lead to separate entrances of the facility. The comfort station was constructed circa 2000 (Figure 9, *View of Comfort Station No. 1, Chester Washington Golf Course*).



Figure 9. View of Comfort Station No. 1, Chester Washington Golf Course
SOURCE: *Sapphos Environmental, Inc., 2016*

Well House

The 110-square-foot well house was likely built in 1992 and is located in the northeastern region of the golf course near the pump house. It is constructed of wood and has a shingle-clad gable roof with barge board (Figure 10, *View of Well House, Chester Washington Golf Course*).



Figure 10. View of Well House, Chester Washington Golf Course
SOURCE: *Sapphos Environmental, Inc., 2016*

Pump House

The present pump house was constructed in 1992 and measures 691 square feet (Figure 11, *Design for Irrigation Pump House, Chester Washington Golf Course*). It has a rectangular floor plan, shingle-clad gable roof, and is constructed of CMUs (Figure 12, *View of Pump House, Chester Washington Golf Course*).

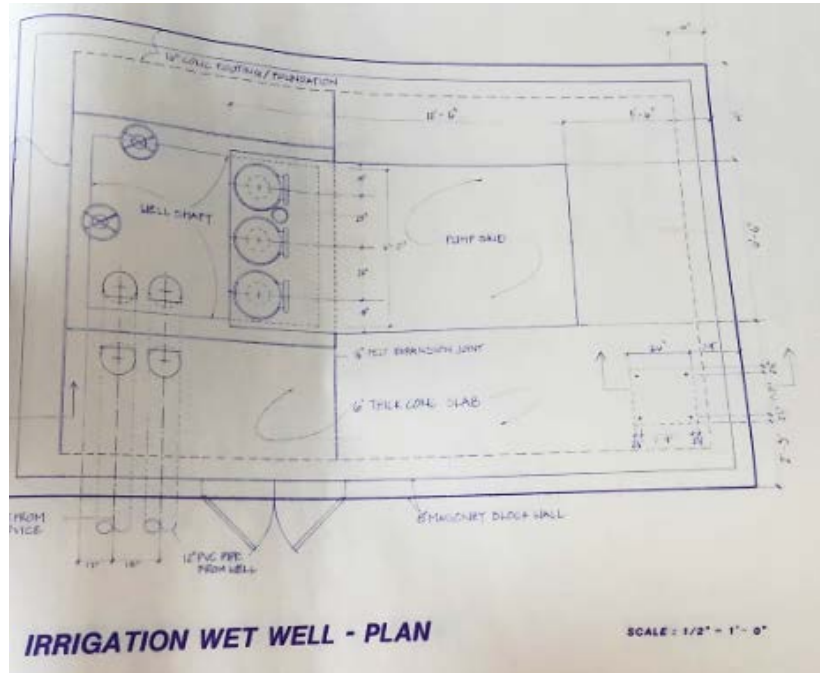


Figure 11. Design for Irrigation Pump House, Chester Washington Golf Course
SOURCE: County of Los Angeles Department of Parks and Recreation, 1992



Figure 12. View of Pump House, Chester Washington Golf Course
SOURCE: Sapphos Environmental, Inc., 2016

SECTION 4.0

REGULATORY FRAMEWORK

This section identifies applicable federal statutes, ordinances, or policies that govern the conservation and protection of historical resources that must be considered during the decision-making process for any undertaking with the potential to affect historical resources.

4.1 FEDERAL

National Historic Preservation Act

The National Historic Preservation Act (NHPA) (Public Law 89-665; 16 U.S.C. 470 et seq.) is legislation intended to preserve historical and archaeological sites in the United States of America. The act created the National Register of Historic Places (NRHP), the list of National Historic Landmarks, and the State Historic Preservation Offices.

Evaluation of a Property's Significance

To be listed in the NRHP, a property must not only be shown to be significant under NRHP criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.¹ The quality of significance is present in districts, sites, buildings, structures, and objects that possess integrity and:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of significant persons in our past; or
- C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded or may be likely to yield, information important in history or prehistory.²

Evaluation of a Property's Integrity

Historic properties either retain integrity (that is, convey their significance) or they do not. Within the concept of integrity, the NRHP criteria recognize seven aspects or qualities that, in various combinations, define integrity:³

Location: Location is the place where the historic property was constructed or the place where the historic event occurred.

¹ National Park Service. *National Register Bulletin 15, "How to Evaluate the Integrity of a Property."* Available at [http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven aspects](http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven%20aspects)

² National Park Service. *National Register Bulletin 15, "How to Apply the National Criteria for Evaluation."* Available at http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_2.htm

³ National Park Service. *National Register Bulletin 15, "How to Evaluate the Integrity of a Property."* Available at [http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven aspects](http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven%20aspects)

Design: Design is the combination of elements that create the form, plan, space, structure, and style of a property.

Setting: Setting is the physical environment of a historic property.

Materials: Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

Workmanship: Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

Feeling: Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.

Association: Association is the direct link between an important historic event or person and a historic property.

To retain historic integrity, a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.⁴

4.2 STATE

California Environmental Quality Act

Pursuant to the California Environmental Quality Act (CEQA), a historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR) (Public Resources Code [PRC], Sections 21083.2 and 21084.1).^{5,6} In addition, resources included in a local register of historical resources or identified as significant in a local survey conducted in accordance with State guidelines are also considered historical resources under CEQA unless a preponderance of facts demonstrates otherwise. According to CEQA, the fact that a resource is not listed in, or determined eligible for listing in, the CRHR or is not included in a local register or survey shall not preclude a Lead Agency, as defined by CEQA, from determining that the resource may be a historical resource as defined in California PRC Section 5024.1.

Historical resources (buildings, structures, or archaeological resources) are considered part of the environment and are subject to review under CEQA. A proposed project that may cause a substantial adverse effect on the significance of a historical resource is a project that may have a significant effect on the environment.

⁴ National Park Service. *National Register Bulletin 15, "How to Evaluate the Integrity of a Property."* Available at [http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven aspects](http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven%20aspects)

⁵ *California Public Resources Code*, Division 13, Section 21083.2.

⁶ *California Public Resources Code*, Division 13, Section 21084.1.

California Register of Historical Resources Program

Created in 1992 and implemented in 1998, the CRHR is a State government program to be used by State and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]).⁷ Certain properties, including those listed in, or formally determined eligible for listing in, the NRHP and California Historical Landmarks (CHL) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the CPHI program, identified as significant in historical resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria (PRC Section 5024.1[c]):⁸

Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Criterion 2: It is associated with the lives of persons important in our past.

Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.

Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory. Resources nominated to the CRHR must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.⁹

It is possible that a resource whose integrity does not satisfy NRHP criteria may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.¹⁰ Resources that have achieved significance within the past 50 years may be also eligible for inclusion in the CRHR provided that enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.¹¹

⁷ *California Public Resources Code*, Section 5024.1.

⁸ *California Public Resources Code*, Section 5024.1.

⁹ Office of Historic Preservation. 14 March 2006. "Technical Assistance Bulletin 6: California Register and National Register, A Comparison (for Purposes of Determining Eligibility for the California Register)." Available at: <http://www.ohp.parks.ca.gov>

¹⁰ Office of Historic Preservation. 4 September 2002. "Technical Assistance Series #3, California Register of Historical Resources: Questions and Answers." Available at: <http://www.ohp.parks.ca.gov>

¹¹ Office of Historic Preservation. 14 March 2006. "Technical Assistance Bulletin 6: California Register and National Register, A Comparison (for Purposes of Determining Eligibility for the California Register)." Available at: <http://www.ohp.parks.ca.gov>

Public Resources Code, Section 5097.5

Public Resources Code, Section 5097.5 defines a misdemeanor as the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

4.3 LOCAL

County of Los Angeles Historic Preservation Ordinance (*Title 22 – Planning and Zoning of the Los Angeles County Code, Part 29 of Chapter 22.52*)

22.52.3010 Purpose

The County of Los Angeles Historic Preservation Ordinance has seven established basic purposes:

- A. Enhance and preserve the distinctive historic, architectural, and landscape characteristics which represent the County's cultural, social, economic, political, and architectural history.
- B. Foster community pride in the beauty and noble accomplishments of the past as represented by the County's historic resources.
- C. Stabilize and improve property values, and enhance the aesthetic and visual character and environmental amenities of the County's historic resources.
- D. Recognize the County's historic resources as economic assets.
- E. Encourage and promote the adaptive reuse of the County's historic resources.
- F. Promote the County as a destination for tourists and as a desirable location for businesses.
- G. Specify significance criteria and procedures for the designation of landmarks and Historic Districts, and provide for the ongoing preservation and maintenance of landmarks and Historic Districts.

22.52.3060 Criteria for Designation of Landmarks and Historic Districts

- A. Property which is more than 50 years of age may be designated as a landmark if it satisfies one or more of the following criteria:
 - 1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community.
 - 2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community.
 - 3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction; or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community; or possesses artistic values of significance to the nation, State, County, or community.
 - 4. It has yielded, or may be likely to yield, information important locally in prehistory or history.
 - 5. It is listed or has been formally determined eligible by the National Park Service for listing on the National Register of Historic Places, or is listed or has been determined eligible by the State Historical Resources Commission for listing on the California Register of Historical Resources.
 - 6. It is one of the largest or oldest trees of the species located in the County.

7. It is a tree, plant, landscape, or other natural land feature having historical significance due to an association with a historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.
- B. Property less than 50 years of age may be designated as a landmark if it meets one or more of the criteria set forth in Section 22.52.3060.A, above, and exhibits exceptional importance.
- C. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may itself be designated as a landmark or included in the landmark designation of a property if the space is more than 50 years of age and satisfies one or more of the criteria set forth in Subsection A, above, or if the space is less than 50 years of age and satisfies the requirements of Section 22.52.3060.B, above.

SECTION 5.0 METHODS

A thorough inventory and evaluation was undertaken to determine if Chester Washington Golf Course, or any of the related structures or buildings constitute as a historical resource pursuant to Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines; that is, whether it is listed in, has been determined eligible for listing in, or appears to meet the criteria for listing in the National Register of Historic Places, California Register of Historical Resources, and/or County of Los Angeles Register of Landmarks and Historic Districts.

This evaluation was performed by Sapphos Environmental, Inc. (Ms. Alexandra Madsen and Ms. Carrie Chasteen), who meets the Secretary of the Interior's *Professional Qualification Standards* for History and Architectural History (Appendix A, *Resumes of Key Personnel*).

The determination of eligibility for consideration as a historical resource was based on:

- Evaluation of historic photographs and Sanborn maps;
- Consideration of reasonably available published and unpublished literature, including newspaper articles, other primary sources, and secondary sources provided by the County of Los Angeles (County) and Sapphos Environmental, Inc.;
- Compilation of land use and land ownership data;
- Review of records available through the California Historical Resources Inventory System (CHRIS), accessed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on October 27, 2015; and
- Surveys of the golf course, appurtenant structures and buildings, and landscape on September 7, 2016.

5.1 RECORD SEARCH

Sapphos Environmental, Inc. submitted a request for a record search of Chester Washington Golf Course to the SCCIC on September 18, 2015. The record search was submitted to obtain known cultural sites either on or within the area, and previous studies conducted within the 0.25-mile boundary of the Chester Washington Golf Course property.

Sapphos Environmental, Inc. reviewed seven cultural resource surveys and reports in addition to two sets of 1:62,500 topographic maps (Appendix B, *Record Search Results, Chester Washington Golf Course*):

- U.S. Geological Survey. 1896 Topographic Map. Redondo, CA.
- U.S. Geological Survey. 1944 Topographic Map. Redondo, CA.

5.2 EVALUATION OF HISTORICAL PHOTOGRAPHS AND MAPS

Sapphos Environmental, Inc. reviewed archival research, planning documentation, and historical photos of the golf course and its buildings, which was provided by the County of Los Angeles Department of Parks and Recreation (County Department) from their archival files:

- Eleven (11) historical photos dated 1964 or 1965 from the County CEO Photo Unit
- Twenty-six (26) historical photos dated 1958, 1962, or 1965 from the County Department of Public Works
- One hundred twenty-six (126) general photos dated 2010 and 2012, and one (1) undated historical photo from the County Department

Sapphos Environmental, Inc. also included a review of eight sets of 1:24,000 topographic maps:

- U.S. Geological Survey. 1924 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1930 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1948 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1950 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1952 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1964 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1972 Topographic Map. Inglewood, CA.
- U.S. Geological Survey. 1981 Topographic Map. Inglewood, CA.

5.3 CONSIDERATION OF PUBLISHED AND UNPUBLISHED LITERATURE

Sapphos Environmental, Inc. conducted further research in the Los Angeles County Historical Society's archival section. Sapphos Environmental, Inc. considered additional information available in published literature and was supplemented with online research. Chester Washington Golf Course staff shared their knowledge of the history of the golf course; information provided by staff for the period pre-dating their tenure was validated through primary and secondary source material (Appendix C, *Sapphos Environmental, Inc. Resources*).

The County Department also provided extensive resources from their files for consideration in the evaluation of Chester Washington Golf Course (Appendix D, *County of Los Angeles Department of Parks and Recreation Sources*):

- Articles from two (2) local newspapers
- Five (5) unpublished documents
- Three (3) memoranda
- One (1) published document

5.4 SITE VISIT

Sapphos Environmental, Inc. (Ms. Madsen and Ms. Chasteen) conducted a site inspection on September 7, 2016. The purpose of the site visit was to evaluate the integrity of the setting, buildings, and structures that date to the original construction of the golf course and subsequent rehabilitation and adaptive reuse of selected structures, replacement structures, and key landscape elements were documented using GPS points for comparison with plans and specification. This information was used to characterize original materials versus those buildings and structures that have been subject to modification. County Department staff shared their knowledge of the history of the golf course, and accompanied Ms. Madsen and Ms. Chasteen on a tour of the golf course. Photographic documentation was conducted by Ms. Chasteen.

SECTION 6.0 RESULTS

This section of the report describes the results of the record search for surveys related to archaeological and historic resources that have been conducted within the Chester Washington Golf Course boundaries and/or 0.25-mile buffer zone, and archaeological and historical resources recorded as a result of those surveys. This section also provides a historic context for the development of golf and golf courses in the United States and Los Angeles, California. This section then specifically describes the results of the evaluation of the extant resources that was undertaken to assess their eligibility for being treated as a historical resource pursuant to Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines.

6.1 ARCHAEOLOGICAL RESOURCES

Upon receiving the record search on October 27, 2015, Sapphos Environmental, Inc. reviewed the data in order to obtain information regarding any cultural sites located within the Chester Washington Golf Course boundaries or 0.25-mile buffer zone. The search was conducted in Township 3 South, Range 14 West, Section 11 within the U.S. Geological Survey (USGS) 7.5-minute series Inglewood topographic quadrangle.

The results of the record search conducted at the South Central Coastal Information Center (SCCIC) indicate that one archaeological study has been conducted within the golf course boundaries, and six archaeological studies have been conducted exclusively within the 0.25-mile buffer zone (Table 6.1-1, *Previous Archaeological Surveys and Reports within the Study Area*). No unique archaeological resources, as defined in Section 21083.2 of the Public Resource Code, have been identified within or near Chester Washington Golf Course.

**TABLE 6.6-1
PREVIOUS ARCHAEOLOGICAL SURVEYS AND REPORTS
WITHIN THE AREA**

Report No.	Year	Report Title	Report Type	Within Property	Within 0.25-Mile Buffer	Authors
LA-00078	1975	Evaluation of the Archaeological Resources and Potential Impact of the Proposed Construction of Route 105 Freeway from El Segundo to Norwalk	Archaeological, Field Study		X	Rosen, Martin D. University of California, Los Angeles Archaeological Survey
LA-02904	1993	Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project	Literature Search	X		Stickel, Gary E. Environmental Research Archaeologists

**TABLE 6.6-1
PREVIOUS ARCHAEOLOGICAL SURVEYS AND REPORTS
WITHIN THE AREA, *Continued***

Report No.	Year	Report Title	Report Type	Within Property	Within 0.25-Mile Buffer	Authors
LA-02950	1992	Consolidation Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project	Archaeological, Field Study		X	Peak & Associates, Inc.
LA-04836	2000	Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project	Archaeological, Field Study		X	Science Applications International Corporation
LA-08255	2006	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II	Archaeological, Field Study, Monitoring, Other Research		X	Arrington, Cindy and Nancy Sikes SWCA Environmental Consultants Inc.
LA-11150	2003	West Basin Municipal District Harbor/ South Bay Water Recycling Project	Archaeological, Field Study		X	Maxwell, Pamela U.S. Army Corps of Engineers
LA_11973	2011	Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report (EIR)/Final Environmental Impact Statement (EIS)	Management/ Planning		X	Metro

LA-00078: In 1975, the University of California, Los Angeles conducted an archaeological field study in support of the proposed construction of the Route 105 Freeway from El Segundo to Norwalk. The assessment did not include the park boundary but did include the 0.25-mile buffer zone. The archaeological investigation yielded negative findings in the 0.25-mile buffer zone.

LA-02904: In 1993, Environmental Research Archaeologists conducted a literature search in support of the West Basin Water Reclamation Project. The assessment included the park boundary and the 0.25-mile buffer zone. The archaeological investigation yielded negative findings in the park boundary and the 0.25-mile buffer zone.

LA-02950: In 1992, Peak & Associates conducted an archaeological field study in support of the proposed Pacific Pipeline Project. The assessment included the 0.25-mile buffer zone. The archaeological investigation yielded 22 findings; however, the resources are located outside of the 0.25-mile buffer zone.

LA-04836: In 2000, Science Applications International Corporation conducted an archaeological field study in support of the Global West Fiber Optic Cable Project. The assessment included the 0.25-mile buffer zone. The archaeological investigation yielded negative findings in the 0.25-mile buffer zone.

LA-08255: In 2006, SWCA conducted an archaeological field study, monitoring, and other research in support of the Qwest Network Construction Project. The assessment included the 0.25-mile buffer zone. The archaeological investigation yielded negative findings in the 0.25-mile buffer zone.

LA-11150: In 2003, the U.S. Army Corps of Engineers conducted an archaeological field study in support of the South Bay Water Recycling Project. The assessment included the 0.25-mile buffer zone. The archaeological investigation yielded 22 findings; however, the resources are located outside of the 0.25-mile buffer zone.

LA-11973: In 2011, Metro conducted management/planning research in support of the Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report (EIR). The assessment included the 0.25-mile buffer zone. The archaeological investigation yielded negative findings in the 0.25-mile buffer zone.

Although a record search was completed, a Phase I Pedestrian Survey to assess the presence or absence of archaeological resources was not completed. Generally, in existing developed parks or golf courses, native soils will be several feet below grade due to prior excavation and grading activities that were conducted for constructing buildings and structures, irrigation, and landscaping. Projects that can be reviewed pursuant to a CEQA Categorical Exemption would not likely create an unusual circumstance with regard to archaeological resources unless a project requires grading and excavation of native soils not disturbed during construction, maintenance, and operation of the park or golf course. Any work that involves earth-moving activity in previously undisturbed native soils should be monitored by, at minimum, workers that have received cultural resource training pursuant to a cultural resources management plan and worker education and awareness program.

6.2 HISTORIC RESOURCES

Sapphos Environmental, Inc. reviewed the data obtained through a record search to identify historic resources located on or within a 0.25-mile radius of Chester Washington Golf Course.

The results of the record search conducted at the SCCIC indicate that no historic studies have previously been conducted within the golf course boundary or 0.25-mile buffer zone. One historic resource has been identified near Chester Washington Golf Course (Table 6.2-1, *Previously Recorded Historic Resources within the Study Area*; Figure 13, *Previously Recorded Historic Resources Map, Chester Washington Golf Course*).

**TABLE 6.2-1
PREVIOUSLY RECORDED HISTORIC RESOURCES
WITHIN THE STUDY AREA**

Primary or Property Number	Trinomial	Description	Within Property	Within 0.25-Mile Buffer	Attribute Codes	Resource Type
P-19-177423		1727 W 130 th Street; The Howard House		X	HP6; Commercial Building	Building

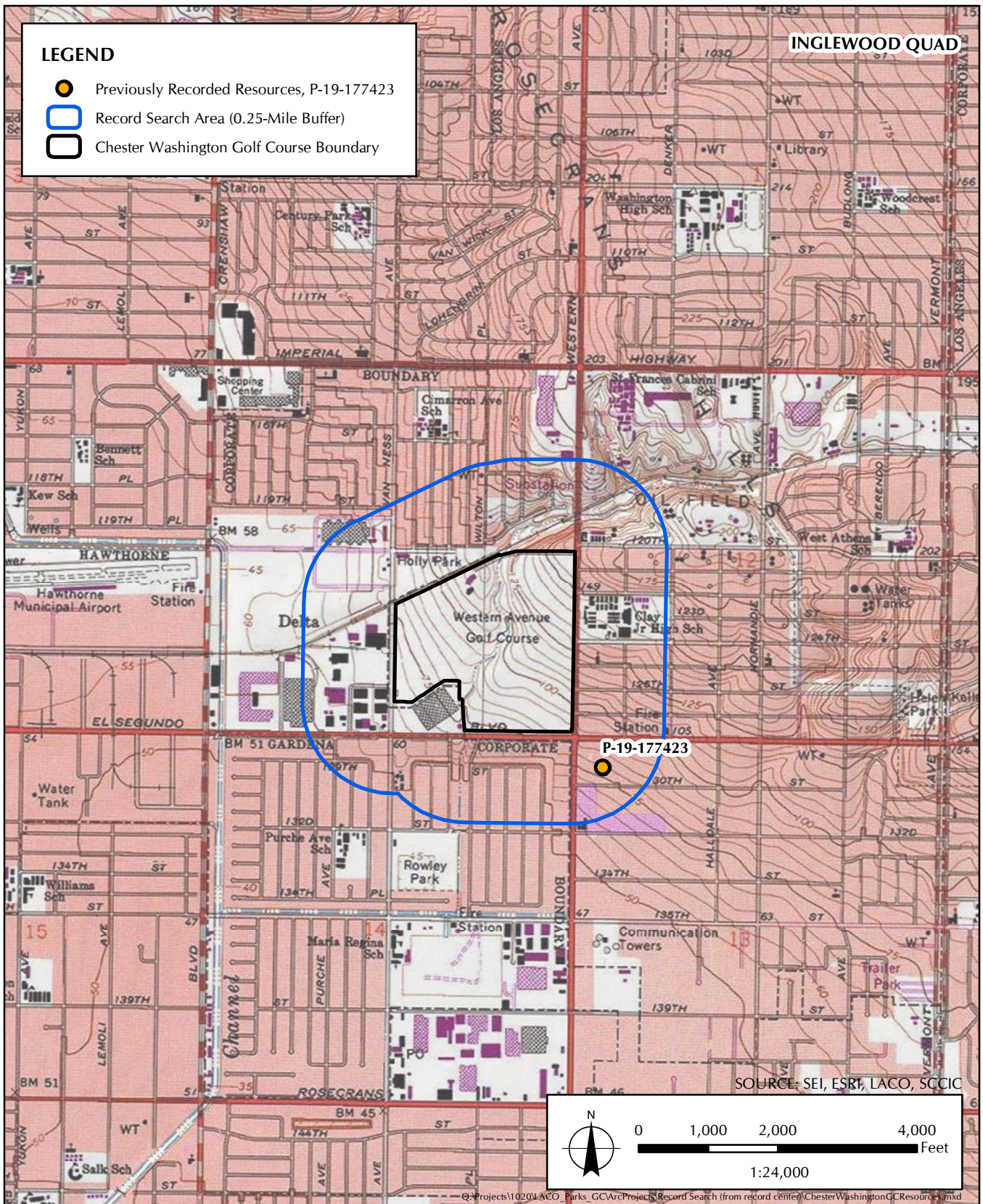


FIGURE 13
Previously Recorded Historic Resources Map, Chester Washington Golf Course

P-19-177423: This resource is a circa 1926 1.5-story commercial building. It has a flat roof, stucco exterior, and square footprint. Its commercial function is visible in the loading dock along its south façade. It is located along W. 130th Street. It appears to be eligible for local listing in the County of Los Angeles Register of Landmarks and Historic Districts (County Register; 5S2). It was not found eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR).

In 2012, Atkins previously found the clubhouse and pro shop ineligible for listing in the CRHR for its architecture pursuant to Criterion 3.¹ Atkins did not evaluate the buildings for other criteria, nor did they evaluate for eligibility for listing on the County Register.

6.3 HISTORY

Golf

According to the International Golf Federation, the game, or sport, of golf is believed to have evolved over more than 2,000 years. Evidence of the Romans engaging in the game of *paganica*, a game involving hitting a stuffed leather ball with a bent stick, date to 100 years before present (bp).² A game similar to golf involving a ball and clubs, called *chuiwa an*, was played in China during the Song Dynasty.³

The modern game of golf was founded in Scotland during the 15th century and the first golf course was located in St. Andrews, constructed in 1552. The game expanded in popularity in Great Britain in the 1500s and 1600s. In the early 17th century, the game was not organized with a standard golf course layout or rules.⁴ Although golf was played across income classes, there was a wide variety in the application. The Honourable Company of Edinburgh Golfers is credited with establishing the first rules of golf in 1744.⁵

The earliest known country club include Blackheath, a 7-hole golf course, located near London and established in 1608; and Saint Andrews Royal and Ancient Club, established in Scotland in 1754. Shortly thereafter, the golf course at Saint Andrews was reduced from 22 holes to 18 holes, setting the standard for recognized format for the game throughout the world. The first country club created exclusively for women, The Ladies Club of St. Andrews, Scotland was formed in 1867.⁶

In 1792, the game of golf made its way to the United States.⁷ Golf had become popular throughout the world, and courses spread throughout the nation. One of the first noted golf course designers in

¹ Harris, Brandy and Kelley Russell (Atkins). Letter to Joan Rupert (County). "CRHP Eligibility Assessment of the Chester L. Washington Golf Course Clubhouse." 13 August 2012. *Memorandum*.

² "History of Golf." International Golf Federation. Available at: <http://www.igfgolf.org/about-golf/history/>

³ "History of Golf." International Golf Federation. Available at: <http://www.igfgolf.org/about-golf/history/>

⁴ "History of the Game of Golf, Including Its Origins." The People History. Available at: <http://thepeoplehistory.com/golfhistory.html>

⁵ "History of the Game of Golf, Including Its Origins." The People History. Available at: <http://thepeoplehistory.com/golfhistory.html>

⁶ "History of Women's Golf." Women's Golf and Travel Concierge. Available at: <http://womensgolfandtravel.com/history-womens-golf/>

⁷ "History of Golf." International Golf Federation. Available at: <http://www.igfgolf.org/about-golf/history/>

the United States was William Flynn (1890–1944). Flynn’s noted courses are primarily located in Ohio.⁸

Golf in the United States

Recently found documents have revealed that the first export of golf clubs from Scotland occurred on June 29, 1739, on the vessel, *Carolina*. The clubs were sold to William Wallace, a business man in Charleston, South Carolina for 1 pound, 18 shillings.⁹ In 1744, Georgia shipping records further document the arrival of golf equipment from Scotland. The first account of a country club in the United States was the South Carolina Golf Club of Charleston, founded in 1786 at Harleston Green on the Charleston Peninsula.^{10,11} However, it no longer exists. Although the Savannah Golf Club in Savannah, Georgia claims to be the oldest country club in the United States, established sometime during 1794–1795; it only dates back to 1899.¹²

Early American golf courses were crude constructions. In the late 19th century, however, well-manicured 9-hole courses with intelligent layouts began to replace the original courses. At that time, most of the early well-known courses were located on the east coast. As golf increased in popularity, so did the courses and societies, spreading to the west coast by 1884.

Ten years later, Newport Golf Club (Newport, Rhode Island) and St. Andrew’s Golf Club (Yonkers, New York) hosted self-labeled national championships; both in which Charles Blair Macdonald placed as runner-up. Convinced that both societies did not hold the authority to conduct a true national championship, Macdonald sought out a governing body to organize a recognized amateur championship and create a written set of rules. Subsequently, the U.S. Golf Association (USGA), initially called the Amateur Golf Association of the United States, was officially formed on December 22, 1894 in New York City. Nearly 10 months later, the inaugural U.S. Amateur Championship took place at Newport Golf Club. A day later, the Newport Golf Club then hosted the inaugural U.S. Open. A few weeks after the U.S. Open, the inaugural U.S. Women’s Amateur was conducted at Meadow Brook Club in Hempstead, New York.¹³

On January 17, 1916, department store magnate Rodman Wanaker gathered a number of golf professionals and leading amateur players with the belief that golf professionals could enhance equipment sales if they formed an association. As a result, the Professional Golfers Association of America (PGA) was formed on April 10, 1916 in New York City with 35 charter members. In October of that same year, the PGA held the first PGA Championship at Siwanoy Country Club in

⁸ “Famous Golf Course Architects.” Hurdzan Golf. Available at: <http://hurdzangolf.com/famous-golf-course-architects/>

⁹ Braswell, Tommy. 1 December 2014. “Rewriting History: Golf Arrives in America even earlier than thought at Charleston.” *The Post and Courier* (Charleston, SC).

¹⁰ Rose, M. L. 19 October 2013. “Early History of Golf in the United States.” Available at: <http://www.livestrong.com/article/381590-early-history-of-golf-in-the-united-states/>

¹¹ Braswell, Tommy. 1 December 2014. “Rewriting History: Golf Arrives in America even earlier than thought at Charleston.” *The Post and Courier* (Charleston, SC).

¹² Laird, Neil, ed. 31 January 2014. “New World: Oldest Golf Clubs and Courses.” Available at: <http://www.scottishgolfhistory.org/news/oldest-golf-clubs-courses-america/>

¹³ Shefter, David, United States Golf Association. 30 November 2014. “Celebrating 120 Years of the USGA (Part 1): 1894–1924.” Available at: <http://www.usga.org/content/usga/home-page/articles/2014/12/celebrating-120-years-of-the-usga-part-1-a-nation-is-introduced-to-golf-21474873960.html>

Bronxville, New York.¹⁴ The following year, the Women's Tournament Committee of the USGA was founded and later became the Women's Committee of the USGA in 1934.¹⁵

Thirty four years later, the PGA established the PGA Tour in December 1968 as a separate organization for tour players. The PGA Tour hosts 47 events annually and hosts three tours: the PGA Tour, the Champions Tour for professionals over the age of 50, and the Web.com Tour for professionals who have not qualified for their Tour card or did not advance to remain on the Tour.¹⁶

In 1944, the Women's Professional Golf Association WPGA was founded and later replaced by the Ladies Professional Golf Association (LPGA) in 1950.^{17,18} The LPGA hosts the LPGA Tour which includes tournaments in 30+ countries.¹⁹

There are now approximately 15,500 public and private golf courses in the United States and an estimated 25.7 million golfers.²⁰

Golf in Los Angeles, California

In 1897, a volunteer association, the Los Angeles Golf Club, leased a 16-acre lot at Pico and Alvarado Streets, becoming the first golf course in Southern California. The 9-hole course was designed by the club founders, Joe Satori and Ed Tufts. The clubhouse, named "The Windmill Links" was converted from an abandoned windmill. As the popularity of golf grew, the Windmill Links quickly became overcrowded and a new site for a larger clubhouse was chosen in 1898 at Hobart and 16th Streets, known as Pico Heights. The clubhouse, named "The Convent Links" after the nearby convent, quickly became overcrowded again and was transported to the northeast corner of Pico and Western Avenues, where it was expanded to an 18-hole course. On May 30, 1911, The Convent Links was relocated for the final time to Beverly Hills, consisting of a 36-hole course and tennis courts.²¹

On July 29, 1899, the Southern California Golf Association (SCGA) was founded

"to promote interest in the game of golf; the protection of the mutual interest of its members; to establish and enforce uniformity in the rules of the game by creating a

¹⁴ "PGA of America History – 1916–1919." Professional Golfers Association. Available at: <http://www.pga.com/pga-america/pga-feature/pga-america-history-1916-1919>

¹⁵ "History of Women's Golf." Women's Golf and Travel Concierge. Available at: <http://womensgolfandtravel.com/history-womens-golf/>

¹⁶ Moehring, Keith, PR 20/20, Cleveland, OH. 18 February 2009. "The Difference Between the PGA of America and PGA Tour." *70th Senior PGA Championship Blog*. Available at: <https://seniorpga2009.wordpress.com/2009/02/18/the-difference-between-the-pga-of-america-and-pga-tour/>

¹⁷ "History of Women's Golf." Women's Golf and Travel Concierge. Available at: <http://womensgolfandtravel.com/history-womens-golf/>

¹⁸ "LPGA Teaching and Club Professionals: A History." Ladies Professional Golf Association. Available at: <http://www.lpga.com/tcp/historytcp.aspx>

¹⁹ "About LPGA." Ladies Professional Golf Association. Available at: <http://www.lpga.com/about-lpga>

²⁰ Gole, Thomas. 2012. "By the Numbers: USA Golfers and Golf Courses." Available at: <http://golf-info-guide.com/golf-tips/golf-in-the-usa/by-the-numbers-usa-golfers-and-golf-courses/>

²¹ "Club History." The Los Angeles Country Club. Available at: <https://www.thelacc.org/Default.aspx?p=DynamicModule&pageid=362588&ssid=272141&vnf=1>

*representative authority, its executive committee, to be a Court of Reference as a final authority in matters of controversy; to establish a uniform system of handicapping; to decide on what links the amateur, open and ladies' championships of Southern California, and such other championships, as may be decided upon by the executive committee, shall be played."*²²

The association included representatives from five country clubs – Los Angeles, Pasadena, Redlands, Riverside Polo & Golf, and Santa Monica. Only the Los Angeles Country Club and Redlands Country Club remain today; Riverside Polo & Golf eventually became The Victoria Club which is a current member.²³

The following year, the City of Los Angeles opened the Riverside Golf Course at Griffith Park, the first municipal golf course in the nation.²⁴

Considered the “golden age” of golf course design, the 1920s saw the opening of Los Angeles courses including Rancho Park, Wilshire, and Hillcrest among others. Notably, three of Los Angeles’ most legendary courses were created in four years’ time by George C. Thomas, Jr., a former fighter pilot and botanist who considered golf course architecture a hobby.²⁵ In 1927, at the behest of SCGA President Edward B. Tufts, the Los Angeles Chamber of Commerce established the Los Angeles Open which remains as the nation’s oldest civic-sponsored event.²⁶

Many private golf courses in Los Angeles County built during the early 20th century faced difficult economic hardship during the Great Depression.²⁷ The County of Los Angeles (County) acquired several facilities during this era in addition to municipally built facilities. The Board of Retirement of the Los Angeles County Employees Retirement Association (LACERA) played a role in the purchase and development of many of the golf courses that are owned by the Department. In 1949, a bill signed by California Governor Earl Warren permitted retirement associations to invest up to 25 percent of existing retirement funds in public works. Public works financed by LACERA included county administrative buildings and other facilities, and would later include golf courses in 1965. At the Department’s recommendation, the Los Angeles County Board of Supervisors authorized negotiations with LACERA for the purchase of two existing private courses, in addition to sites of five planned courses and their early developments.²⁸

At the time of this evaluation, *Golf Club Atlas* recognizes the following as the 10 most notable golf courses in Los Angeles County:²⁹

²² “SCGA History, Part 1: 1899–1919, Chapter 3: Founding the SCGA.” Southern California Golf Association. Available at: <http://www.scga.org/about/scga-history/part-1>

²³ “SCGA History.” Southern California Golf History. Available at: <http://www.scga.org/about/scga-history>

²⁴ “Los Angeles Sports History.” Los Angeles Almanac. Available at: <http://www.laalmanac.com/sports/sp18.htm>

²⁵ Tingle, Steven. 7 August 2015. “A Long Drive Down Memory Lane.” *C-Suite Quarterly*, Calabasas, CA. Available at: <http://csq.com/2015/08/golf-in-los-angeles-a-long-drive-down-memory-lane/#.Vqqaxvkrjph>

²⁶ “SCGA History, Part 2: 1920–1939, Chapter 3: Professional Gold and National Tournaments Arrive.” Southern California Golf Association. Available at: <http://www.scga.org/about/scga-history/part-2>

²⁷ “All Los Angeles Golf Courses.” GolfNow Solutions. Available at: <https://www.golfnow.com/losangeles/courses/all-courses>

²⁸ “7 New Public Course for L.A. County.” *Golfdom*. October/November 1965. Volume 39, No. 10: 123-124. Available here: <http://archive.lib.msu.edu/tic/golfd/article/1965oct123.pdf>

²⁹ Harshbarger, Dave. “Dynamic Map of Course Profiles.” Available at: [“http://golfclubatlas.com/best-of-golf/gca-fusion-tables/](http://golfclubatlas.com/best-of-golf/gca-fusion-tables/)

- Woodland Hills Golf Course
- Riviera Country Club
- Bel Air Country Club
- Lakeside Golf Club
- Wilshire Country Club
- Oakmont Country Club
- Annandale Golf Club
- San Gabriel Country Club
- Hacienda Golf Club
- Meadowlark Golf Club

In a 2013 survey, three additional Los Angeles area golf courses were recognized as among the best Southern California public golf courses:³⁰

- Angeles National Golf Club
- Trump National Golf Club
- Arroyo Seco Golf Course
- Rancho Park Golf Course
- De Bell Golf Course

As of 2016, the County oversees a total of 19 public golf courses available to all Angelinos and visitors.

South Los Angeles

The Gabrielino tribe of Native Americans occupied the entire Los Angeles Basin and the San Fernando Valley, including the watersheds of the San Gabriel, Santa Ana, and Los Angeles Rivers. They also inhabited the offshore islands of San Clemente, Santa Catalina, and San Nicolas.³¹ The Gabrielino were one of two of the wealthiest, most powerful and most populous native groups in Southern California. Their influence spread as far north as the San Joaquin Valley, as far east as the Colorado River, and south as far as Baja California.³²

The Gabrielino occupied small villages. They were traditionally coastal hunters and gatherers who exploited native plants and animals. The high desert woodlands, the chaparral and the coastal areas of Southern California provided the Gabrielino with a rich and abundant diet including acorn, pine nut, small game, deer, and quail. Marine mammals and shellfish were also an important part of the diet, mainly among the coastal population.³³

The Gabrielino were assimilated into the Spanish mission system during the 18th and 19th centuries. Spanish reports estimate that village populations ranged between 50 and 200

³⁰ Peterson, Elizabeth. 17 June 2013. "Best Public Golf Courses in Southern California." Available at: <http://losangeles.cbslocal.com/top-lists/best-public-golf-courses-los-angeles/>

³¹ Kroeber, A.L. 1952. *Handbook of the Indians of California*. New York, NY: Dover Publications, Inc.

³² Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In *Handbook of North American Indians*, Vol. 8, ed. R.F. Heizer. Washington, D.C.: Smithsonian Institution.

³³ McCawley, W. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Banning, CA: Malki Museum Press.

inhabitants. As many as 50 to 100 villages existed during the late 18th century in the San Fernando Valley and Los Angeles Basin.³⁴

Spanish influence in the area occurred in 1542, when Juan Cabrillo arrived in the area. Then, in 1769, Gaspar de Portola led an expedition across Southern California with Catholic monks Junipero Serra and Juan Crespi. Portola named a river they crossed "El Río de Nuestra Señora la Reina de los Ángeles de Porciúncula," "The River of Our Lady the Queen of the Angels of the Porciúncula ("little portion"). In 1781, the pueblo of Los Angeles was founded 10 miles from Mission San Gabriel Arcangel to reinforce Spanish control of the area. In 1784, the governor awarded Spanish soldier Juan Jose Dominguez a land grant of 75,000 acres, known as the Rancho San Pedro, which encompassed present-day Carson.³⁵

Mexico gained independence from Spain in 1821, contributing to the continuing decline of Spanish influence in the area. Two years later, Juan Jose Dominguez's nephew and heir, Cristobal Dominguez, was re-granted the land. In 1850, Los Angeles was incorporated as a city, but its isolated communities located all across the coastal plain continued the rancho and hacienda lifestyle.³⁶

In 1876, the Southern Pacific Railroad completed its line to Los Angeles and started a period of expansion in the city. Oil was discovered in 1892, and by 1923 Los Angeles was supplying one-quarter of the world's oil. Even more important to the city's growth was water. In 1913, William Mulholland completed the Los Angeles Aqueduct that assured the city's growth.³⁷

Residential development in South Los Angeles began in the 1920s when large housing tracts of single-family homes were constructed on subdivided land including the Goodyear Tract by Goodyear Tire which was built around the Goodyear factory for workers to live.³⁸ The term 'South Central' came about in the 1920s as a place name for the growing concentration of black-owned business on Central Avenue.³⁹ Los Angeles may have had more opportunity for immigrants and African-Americans but segregation and restrictive deed covenants were still upheld in the city. African-Americans, Mexicans, Jews, and other minorities were restricted to live in certain neighborhoods.

The African-American community in Los Angeles was first centered at 5th Street and Central Avenue in downtown Los Angeles. The community was pushed south, down Central Avenue as the city of Los Angeles expanded, and the population grew and neighborhood segregation zoning changed. In the 1940s, a large influx of African-Americans moved to Los Angeles from the southern United States for the affordable tract homes, new jobs in war manufacturing, and to escape Jim Crow laws of the Deep South. The thriving culture of nightclubs, theaters, and other shared

³⁴ Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In *Handbook of North American Indians*, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution.

³⁵ "Carson: Frequently Asked Questions." County of Los Angeles Public Library. Accessed November 2017. Available at: <http://www.colapublib.org/history/carson/faq.html#q1>

³⁶ "Early History of Los Angeles." South Central History. Accessed April 2016. Available at: <http://www.southcentralhistory.com/early-history-of-los-angeles.php>

³⁷ South Central History. Accessed April 2016. "Crack Epidemic?" Available at: <http://www.southcentralhistory.com/crack-epidemic.php>

³⁸ The Goodyear Factory was deemed eligible for the NRHP in 1981.

³⁹ Jimenez y West; Christopher D.; Matthew W. Roth; Alison R. Jefferson; and Morgan P. Yates. 2006. *Intersections of South Central: People and Places in Historic Contemporary Photographs*. Automobile Club of Southern California.

community venues that had already flourished along the Central Avenue corridor expanded briefly during this time, and contributed to American jazz culture. However, racial violence against African-Americans in South Los Angeles followed the Supreme Court ban of racially restrictive covenants in 1948, a decision that allowed expansion of the areas blacks were allowed to live in.⁴⁰

Membership in youth gangs and car clubs such as the “Low Riders,” the “Slausons,” and “Blood Alley” increased as a means to help defend neighborhoods during the 1950s; these clubs formed an alliance during the Watts Rebellion of August 1965. The decade also began a targeted increase in the availability of drugs that began to impact families and neighborhoods across South Los Angeles significantly,⁴¹ along with a series of manufacturing and retail closures; divestment by financial institutions; a diminished number of family-owned businesses; degradation of public schools in the area; and eventual urban decay. This process accelerated in the 1960s and 1970s during the deindustrialization of southern Los Angeles, but the neighborhoods of South Los Angeles, Watts, and Inglewood have remained predominantly African-American communities and challenges continue to be addressed.⁴²

Chester Washington Golf Course

The land that is now Chester Washington Golf Course was part of a 1,500-acre ranch owned by the O.T. Johnson Corporation from the early 20th century.⁴³ O.T. Johnson allotted 120 acres for a golf course in the area, and the course was designed by John Dunn.⁴⁴ No information is available on John Dunn or any other architects or designers who may have been associated with the development of the golf course. Landscaping began in 1926 and grass, likely in the form of grass seed, for the golf course was transported from the state of Washington in refrigerated sacks. On March 11, 1928, the golf course officially opened as the La Avenida Golf Course. The Avenida Golf Club was organized in 1930 by 15 golfers who voted William Hunter president.⁴⁵

In 1931, the name of the golf course was changed to Western Avenue Golf Course, and by 1953 there were over 300 members of the golf club. At this time, the golf course mostly had a number of smaller buildings; a 1930 historical aerial shows a smattering of small buildings with square footprints (Figure 14, *Historical Aerial of Western Avenue Public Golf Course [1930]*). One of these buildings likely survived to the 1960s, as seen in a 1965 aerial photograph, but was demolished at an unknown date (Figure 15, *Aerial of Golf Course Depicting Demolished Building [1965]*).

⁴⁰ Darden, Joe T. 1995. “Black Residential Segregation Since the 1948 Shelley v. Kraemer Decision.” *Journal of Black Studies*.

⁴¹ Fagan, J.E. 1993. “The political economy of drug dealing among urban gangs.” In *Drugs and Community*, Charles C. Thomas, pp. 19–54.

⁴² Scott, Allen J., *South-Central Los Angeles: Anatomy of an Urban Crisis*. Los Angeles, CA: Lewis Center, Graduate School of Architecture and Urban Planning, University of California Los Angeles.

⁴³ Jackson, Philip. Letter to Ray Dortch. “History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974.” 17 January 1978.

⁴⁴ Wexler, Daniel. “History in the Making.” 9 April 2007. *Los Angeles Times*. <http://www.latimes.com/sports/la-sp-history9apr09-story.html>

⁴⁵ Jackson, Philip. Letter to Ray Dortch. “History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974.” 17 January 1978.



Figure 14. Historic Aerial of Western Avenue Public Golf Course (1930)

SOURCE: U.S. Geological Survey, 7.5-minute Inglewood Topographic Quadrangle, 1930



Figure 15. Aerial of Golf Course Depicting Demolished Building (1965)

SOURCE: County of Los Angeles Department of Parks and Recreation, 1965

Golf, like many other sports in America, was originally integrated before a “Caucasian-only” clause was adopted. The first African-American to play golf was John Shippen Jr., who competed in the 1896 Second U.S. open at Shinnecock Hills, in which he registered as Native American.⁴⁶ Although other tournament competitors originally protested his participation, PGA members eventually relented and played alongside him. Shippen played in six U.S. Opens, finishing in fifth place in 1896 and 1902 before retiring in 1924. The PGA “Caucasian-only” clause was adopted in 1934. The United Golf Association, formed by Robert Hawkins, ultimately established a tour for players excluded from PGA events.⁴⁷

⁴⁶ Denney, Bob. “John Shippen Jr.: African American Pioneer; first American-born golf professional.” 2 February 2015. *Professional Golfers Association*. <http://www.pga.com/news/pga/john-shippen-jr-first-African-American-golf-professional>

⁴⁷ “Timeline of African American achievements in golf.” 4 February 2011. *Professional Golfers Association*. <http://www.pga.com/timeline-African-American-achievements-in-golf>

The year 1948 was a time for many firsts in American golf. One occurred at Western Avenue Golf Course during the June 21, 1948 tournament, which marked the first time in the west that women were able to compete in an open tournament with male golfers.⁴⁸ That same year, African-American golfers Teddy Rhodes, Bill Spiller, and Madison Gunter sued their way into the U.S. Open, claiming their livelihoods were being denied by the PGA based on race.⁴⁹ The PGA agreed to invite them to their top tournaments and the lawsuit was dropped. Rhodes fought his way into 69 PGA events, and began a crusade against racism in professional golf that would burn through Western Avenue Golf Course.

One reason the Western Avenue Golf Course became so embroiled in the integration of golf in Los Angeles is because of its change in ownership. In 1953, the Western Avenue Golf Course came under threat of real estate subdivision. County Supervisor Kenneth Hahn argued that the golf course should be saved and the County shortly thereafter acquired it in 1954.⁵⁰

Controversy surrounded the Western Avenue Golf Course in 1955, when Maggie Hathaway, an African-American social activist, applied for membership to the course's Women's Golf Club.⁵¹ The Caucasian-only group denied her application and Hathaway brought up the matter with Supervisor Kenneth Hahn.⁵² Hathaway argued that the association was not allowed to discriminate based on race when practicing on County-owned land, which she and other minorities paid taxes to help maintain. Hahn agreed, and the group was expelled from the golf course. He extended the ban throughout the County, forcing all-white golf groups to diversify and admit people of color golfers.⁵³ A nondiscrimination clause was added to County Department facilities contracts:

*Concessionaire agree that he shall not make any discrimination, distinction, or restriction on account of color, race, religion, ancestry, or national origin contrary to the provisions of Section 51 of the Civil Code of the State of California which is incorporated herein by reference as if set forth here at in full.*⁵⁴

Western Avenue Golf Course became integrated and many notable African-American golfers, such as Charles Sifford, consecutively and consistently practiced at the golf course during the height of their careers.

In 1955, Charles "Charlie" Sifford and Ted Rhodes were the first African-American golfers to play at the Gardena Valley Open Golf Tournament held at Western Avenue Golf Course.⁵⁵ Sifford was the first African-American to be admitted on a PGA Tour, joining the 1960 season. He won the 1967 Greater Hartford Open Invitational, the 1969 Los Angeles Open, and the 1975 PGA Seniors' Championship.⁵⁶ In 2004, Sifford was the first African-American to be enshrined in the World Golf

⁴⁸ "Male and Female Golf Meet Scheduled Here June 21st." 17 June 1948. *Los Angeles Sentinel*.

⁴⁹ Lewis, Jason. "Black History Month: The First Black Golfers." 3 February 2012. *Los Angeles Sentinel*. <https://lasentinel.net/black-history-month-the-first-black-golfers.html>

⁵⁰ County of Los Angeles Department of Parks and Recreation. "Annual Report: Fiscal Year." June 30, 1954. Board of Supervisors

⁵¹ Clark, Libby. "A 'Taste' of History- A Remembrance." 10 April 2003. *Los Angeles Sentinel*.

⁵² Dailey, John. "Divot Diggings: Maggie's Struggle Not a Piece of Cake." 27 October 1994. *Los Angeles Sentinel*.

⁵³ Clark, Libby. "A 'Taste' of History- A Remembrance." 10 April 2003. *Los Angeles Sentinel*.

⁵⁴ Dailey, John. "Divot Diggings: Maggie's Struggle Not a Piece of Cake." 27 October 1994. *Los Angeles Sentinel*.

⁵⁵ "Ted Rhodes, Charles Sifford Will Play in Golf Meet Here." 17 November 1955. *Los Angeles Sentinel*.

⁵⁶ "Timeline of African American achievements in golf." 4 February 2011. *Professional Golfer's Association*. <http://www.pga.com/timeline-African-American-achievements-in-golf>

Hall of Fame. In 2015, President Barack Obama honored him with the nation's highest civilian honor, the Presidential Medal of Freedom.⁵⁷ Sifford was recognized for his success at the golf course in 2015, when 120th Street was changed to Charlie Sifford Drive in his honor. His son, Charles Sifford Jr., accepted a duplicate of the street sign from County Supervisor Mark Ridley-Thomas (Figure 16, *County Supervisor Mark Ridley-Thomas and Charles Sifford Jr. at Dedication of Charlie Sifford Drive*; Figure 17, *View of Charles Sifford Plaque, Chester Washington Golf Course*).⁵⁸



Figure 16. County Supervisor Mark Ridley-Thomas and Charles Sifford Jr. at Dedication of Charlie Sifford Drive

SOURCE: *Los Angeles Wave Newspapers, 2015*

⁵⁷ Wanlass, Don. "Sports Digest: Street Renamed in honor of Charlie Sifford." 20 August 2015. *Los Angeles Wave*. <http://wavenewspapers.com/sports-digest-street-renamed-in-honor-of-charlie-sifford/>

⁵⁸ Taylor, Barbara. "Charlie Sifford Gets a Los Angeles County Street Named in His Honor." August 2015. *African American Golfer's Digest*. <http://www.africanamericangolfersdigest.com/charlie-sifford-gets-a-los-angeles-county-street-named-in-his-honor/>



Figure 17. View of Charles Sifford Plaque, Chester Washington Golf Course
 SOURCE: Sapphos Environmental, Inc., 2016

Ted Rhodes, the player that sued his way into the U.S. Open in 1948, was another notable golfer that frequented Western Avenue Golf Course. Rhodes was recognized as the first African-American professional golfer, and went on to mentor Charlie Sifford. Debbie Rhodes, his daughter, remarked of the golf course: "It is not often as blacks that we get to talk about a place of fond memories and lasting friendships. Where black golfers got a start at making a name for themselves. This is what Chester Washington Golf Course (formerly Western Avenue Golf Course) meant to my father [Ted Rhodes]." ⁵⁹

Other notable African-American golfers who practiced at the golf course on a regular basis include: Alton Duhon, Charlie Lee, Bill Spiller, Jim Brown, and heavy-weight boxer Joe Louis. ⁶⁰

In 1956, construction began on the original clubhouse, now the pro shop, which was completed by 1958. In the early 1960s, much of the golf course landscaping was redesigned, and six bridges were constructed. A clubhouse was designed by Nielsen, Moffatt & Wolverton in 1963 and constructed in 1965. Nielsen, Moffatt & Wolverton were located out of Los Angeles and designed a number of hospitals, medical centers, and post offices. ⁶¹

In March of 1972, the Minority Associated Golfers, with entertainment by the Jackson Five, dedicated the Junior Golfers Green. The event was notable for the musical group's surprise visit, in which the five singers and their baby brother Jackson doled out autographs. ⁶²

⁵⁹ Dailey, John. "Washington Golf Course: Back to the Future." 26 June 1986. *Los Angeles Sentinel*.

⁶⁰ Wexler, Daniel. "History in the Making." 9 April 2007. *Los Angeles Times*. <http://www.latimes.com/sports/la-sp-history9apr09-story.html>

⁶¹ "Nielsen, Moffatt & Wolverton." 1970. *American Architects Directory*.

⁶² Maggie Hathaway, "Tee Time: Jackson 5 Signs Charter," 16 March 1972, pg. B3.

The golf course was renamed after newspaper magnate Chester L. Washington in 1982, a year before Washington's death. Chester L. Washington was an African-American newspaper magnate who started his career in Pittsburgh, Pennsylvania. After moving to Los Angeles, Washington served as the first African-American editor for the *Los Angeles Mirror-News* before taking a position as the editor of the *Los Angeles Sentinel*, the city's oldest black-owned weekly newspaper. In 1966, he bought the *Central News* and *Southwest News*, two weekly newspapers in South Los Angeles. Washington went on to purchase the five weekly *Wave* newspapers in 1971, eventually creating the 13-newspaper *Central News-Wave Publications*.⁶³

6.4 CHRONOLOGY

This section examines the construction and design history of the Chester Washington Golf Course and its buildings as seen Section 6.5, *Significance Evaluation*.

1. **1926**
O.T. Simpson set aside 120 acres for a golf course; John Dunn designed the landscaping.⁶⁴
2. **March 11, 1928**
The golf course officially opened as the La Avenida Golf Course.⁶⁵
3. **1930**
Local golfers organized the Avenida Golf Club.⁶⁶
4. **1931**
The golf course was renamed Western Avenue Golf Course.⁶⁷
5. **January 1954**
The County acquired Western Avenue Golf course.⁶⁸
6. **August 16, 1955**
F.R. Dobric and L.A. Calif completed drawings for a dining room addition to the existing building at Western Avenue Golf Course.⁶⁹
7. **October 1956**
Schroeder completed a floor plan design for the pro shop (original clubhouse) at the golf course.⁷⁰

⁶³ Hernandez, Marita. "Head of Black-Owned Newspaper Chain Dies." 1 September 1983. *Los Angeles Times*.

⁶⁴ Wexler, Daniel. "History in the Making." 9 April 2007. *Los Angeles Times*. <http://www.latimes.com/sports/la-sp-history9apr09-story.html>

⁶⁵ Jackson, Philip. Letter to Ray Dortch. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." 17 January 1978.

⁶⁶ Jackson, Philip. Letter to Ray Dortch. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." 17 January 1978.

⁶⁷ Jackson, Philip. Letter to Ray Dortch. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." 17 January 1978.

⁶⁸ County of Los Angeles Department of Parks and Recreation. "Annual Report: Fiscal Year." June 30, 1954. Board of Supervisors

⁶⁹ F.R. Dobric and L.A. Calif. "Interior Elevations and Details: Dining Room Addition to Existing Unit at Western Avenue Golf Course." 16 August 1955. Sheet No. 2

8. **January 18, 1957**
H. L. Architects completed designs for a concession stand and comfort station No. 2.⁷¹
9. **November 12–15 1959**
Mayor Adams W. Bolton of Gardena proclaimed Kiwanis Tournament Days.⁷²
10. **February 1960**
Builders completed the pro shop (original clubhouse).⁷³
11. **December 1960**
R.W.R. designed a tree planting program for the golf course.⁷⁴
12. **December 1961**
Fernan and Barry at the County Department of Engineering designed pedestrian bridges.⁷⁵
13. **December 1963**
Nielsen, Moffatt & Wolverton designed the current golf course clubhouse.⁷⁶
14. **October 1, 1969**
R.W.S. completed air conditioning additions to the golf course buildings.⁷⁷
- March 5, 1972**
15. Junior Golfers Green dedicated by Minority Associated Golfers, Maggie Hathaway, President; Kenneth Hahn, Supervisor; with dedication ceremonies by the Jackson Five.⁷⁸
16. **August 1974**
G.L. Polon completed drainage improvements for the golf course.⁷⁹
17. **November 1977**
Electrical plot plan for the driving range lighting was completed.⁸⁰

⁷⁰ Schroeder. Department of the County Engineer. "Floor Plan: New Clubhouse at Western Avenue Golf Course." October 1956. Sheet No. 3. Work Order No. 8818—05.

⁷¹ H.H. Department of County Engineer. "Concession Stand for Parks and Recreation at Western Ave Golf Course." 18 January 1957. Sheet No. 2.

⁷² Jackson, Philip. Letter to Ray Dortch. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." 17 January 1978.

⁷³ Schroeder. Department of the County Engineer. "Floor Plan: New Clubhouse at Western Avenue Golf Course." October 1956. Sheet No. 3. Work Order No. 8818—05.

⁷⁴ R.W.R. Department of County Engineer. "Tree Planting Program: Western Ave Golf Course." December 1960. Sheet No. 3.

⁷⁵ Barry and Fernana. Department of County Engineer. "Pedestrian Bridges at Western—Ave Golf Course." December 1961. Sheet No. 1. Work Order No. 8818—20.

⁷⁶ Nielsen, Moffatt and Wolverton Architects and Engineers. "Golf Course Clubhouse: Western Avenue Golf Course." December 1963. Sheet No. C-1. Spec. No. 2270.

⁷⁷ Levine and McCain Consulting Engineers. "Air Conditioning Addition to Western Avenue Golf Course Clubhouse." 12 December 1968. Cover Sheet.

⁷⁸ Maggie Hathaway, "Tee Time: Jackson 5 Signs Charter," 16 March 1972, *Los Angeles Sentinel*, pg. B3.

⁷⁹ G.L. Polon. Department of the County Engineer. "Western Ave Golf Course Drainage Improvements." August 1974.

⁸⁰ Architect. "Western Avenue Golf Course Driving Range Lighting." November 1977. Work Order No. 4101—82.

18. **January 1982**
County Board voted to rename Western Avenue Golf Course as Chester L. Washington Golf Course.⁸¹
19. **March 18, 1982**
County Board dedicated Chester L. Washington Golf Course.⁸²
20. **August 8, 1988**
County Department of Facilities management approved the design for general improvements at Chester Washington Golf Course.⁸³
21. **May 12, 1992**
Designed plan for waterscape system construction details was completed.⁸⁴
22. **November 14, 1995**
Designer completed golf cart storage addition to the clubhouse.⁸⁵
23. **2004**
Charles Sifford was the first African-American to be listed in the World Golf Hall of Fame.⁸⁶
24. **2012**
Exterior rectangular turquoise accent tiles on the clubhouse were removed and replaced with stucco.
25. **September 2012**
The pro shop front entry underwent renovation.⁸⁷
26. **March 2013**
The clubhouse interior was renovated; interior of the pro shop was redesigned.⁸⁸
27. **August 16, 2015**
120th Street was renamed in honor of Charles Sifford.
28. **2015**
President Obama awarded Charles Sifford the Presidential Medal of Freedom.⁸⁹

⁸¹ "Golf Course renamed." 20 January 1982. *Wave Newspapers*.

⁸² County of Los Angeles Department of Parks and Recreation. "Dedication: Chester L. Washington Golf Course." March 18, 1982. Pamphlet.

⁸³ Los Angeles County Facilities Management Department and Department of Parks and Recreation. August 8, 1988. "Chester Washington Golf Course Improvements: Phase II."

⁸⁴ O.D.R. "Waterscape System Construction Details." 12 May 1992.

⁸⁵ City of Pasadena. "Proposed Cart Storage Addition for American Golf Corp. Chester Washington Golf Course." 14 November 1995.

⁸⁶ Wanlass, Don. "Sports Digest: Street Renamed in honor of Charlie Sifford." 20 August 2015. *Los Angeles Wave*. <http://wavenewspapers.com/sports-digest-street-renamed-in-honor-of-charlie-sifford/>

⁸⁷ Golf Course Renovation Log. On file with the County.

⁸⁸ Golf Course Renovation Log. On file with the County.

⁸⁹ Wanlass, Don. "Sports Digest: Street Renamed in honor of Charlie Sifford." 20 August 2015. *Los Angeles Wave*. <http://wavenewspapers.com/sports-digest-street-renamed-in-honor-of-charlie-sifford/>

6.5 SIGNIFICANCE EVALUATION

Buildings and Structures

Chester Washington Golf Course includes four buildings and one structure that were evaluated to assess the eligibility of the facility in relation to making a determination regarding the eligibility of the golf course as a whole for listing in the NRHP, CRHR, or County Register. There is a total of approximately 23,550 square feet in the buildings and structures evaluated (Table 6.5-1, *Buildings and Structures Evaluated*; Figure 18, *Significance Evaluation Map, Chester Washington Golf Course*).

**TABLE 6.5-1
BUILDINGS AND STRUCTURES EVALUATED**

Building/Structure	Construction Year	Alteration Year	Demolition Year	Architect(s)	Builder(s)	Area (Sq. Ft.)	No. of Stories	Contributing	Non-Contributing	Historic District or Contributing Element	Period of Significance
Clubhouse	1965	2012/2013	N/A	Nielsen-Moffatt and Wolverton	LA-KE Construction Company	16,669	2	X		Contributing Element	1965
Pro Shop	1957-58	2012/2013	N/A	Schroeder (County Engineer)	Unknown	4,270	1	X		Contributing Element	1957-58
Bridge	1962	N/A	N/A	Fernan and Barry (County Engineers)	Unknown	27	N/A	X		Contributing Element	1962
Comfort Station No. 2	1957	N/A	N/A	H. L. Architects	Unknown	1,442	1	X		Contributing Element	1957
Concession Stand	1957	N/A	N/A	H. L. Architects	Unknown	1,142	1	X		Contributing Element	1957



FIGURE 18
 Significance Evaluation Map, Chester Washington Golf Course

Clubhouse

Designed in 1962 and built in 1965, the 16,669-square-foot clubhouse is a Mid-Century Modern-style building (Figure 19, *Design Plan for Clubhouse [1962], Chester Washington Golf Course*; Figure 20, *Construction of Clubhouse [1965], Chester Washington Golf Course*). The clubhouse was designed by Los Angeles-based architects Nielsen, Moffatt & Wolverton in 1962, and built by LA-KE Construction Company in 1965.



Figure 19. Design Plan for Clubhouse (1962), Chester Washington Golf Course
SOURCE: Los Angeles County Department of Public Works, 1962



Figure 20. Construction of Clubhouse (1965), Chester Washington Golf Course
SOURCE: Los Angeles County Department of Public Works, 1965

The clubhouse has a complex, horseshoe-shaped floor plan, flat roof, and stuccoed exterior. A projecting concrete porte-cochere provides a symmetrical compliment to the otherwise low and unassuming façade. This entrance, originally a lighter color and adorned in selected locations with turquoise tiles, has been heavily altered in the past few years, and is missing much of its original historic fabric. Additionally, rough-hewn stone veneer was added to the median and entrance surround during this alteration (Figure 21, *View of Altered Clubhouse, Chester Washington Golf Course*).



Figure 21. View of Altered Clubhouse, Chester Washington Golf Course
SOURCE: *Sapphos Environmental, Inc., 2016*

The southeastern façade is concave and curved with large, floor-to-ceiling windows. A deep, projecting overhang accentuates the curvilinear form of the building. Turquoise tile was removed in the 2012/2013 renovation (Figure 22, *View of Clubhouse Southeastern Façade, Chester Washington Golf Course, 2010*; Figure 23, *View of Clubhouse Southeastern Façade, Chester Washington Golf Course, 2016*).



Figure 22. View of Clubhouse Southeastern Façade, Chester Washington Golf Course, 2010
SOURCE: *County of Los Angeles Department of Parks and Recreation, 2010*



Figure 23. View of Clubhouse Southeastern Façade, Chester Washington Golf Course, 2016
SOURCE: Sapphos Environmental, Inc., 2016

Atkins previously found the clubhouse ineligible for listing in the CRHR for its architecture pursuant to Criterion 3.⁹⁰ The clubhouse lost some of its integrity after a 2012/2013 renovation, in which some of the entrance's original historic fabric was removed. However, removal of the historic tile, paint, and added rock veneer alterations are reversible which is in keeping with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. Moreover, although the building has lost some integrity, it retains sufficient integrity with its general form and historic fabric to convey significance and reflect its history of hosting notable events and people. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charlie Sifford, Maggie Hathaway, and Ted Rhodes among others. The pro shop as an individual resource does not sufficiently convey an association with significant events and persons to rise to the threshold for listing in the NRHP, CRHR, or County Register pursuant to any criteria.

Pro Shop

The 4,270-square-foot pro shop was designed in 1956 and is situated in the north-central region of the golf course (Figure 24, *Design of Original Clubhouse, Chester Washington Golf Course*). It has an 'L'-shaped floor plan and a cross-gable roof with a projecting awning upheld by columns (Figure 25, *View of Pro Shop [1958], Chester Washington Golf Course*).

⁹⁰ Harris, Brandy and Kelley Russell (Atkins). Letter to Joan Rupert (County). "CRHP Eligibility Assessment of the Chester L. Washington Golf Course Clubhouse." 13 August 2012. *Memorandum*.



Figure 24. Design of Original Clubhouse, Chester Washington Golf Course
SOURCE: County of Los Angeles Department of Parks and Recreation, 1956



Figure 25. View of Pro Shop (1958), Chester Washington Golf Course
SOURCE: Los Angeles County Department of Public Works, 1958

Wood siding clads the exterior, and single- and double-light casement windows line the south and west facades of the building (Figure 26, *Northeast Facing View of Pro Shop, Chester Washington Golf Course*). A large concession window that opens to the pro shop's office is located in the southwest corner of the building. The pro shop was designed by County Engineer Schroeder and completed between 1957 and 1958.



Figure 26. Northeast Facing View of Pro Shop, Chester Washington Golf Course
SOURCE: *Sapphos Environmental, Inc., 2016*

Atkins previously found the pro shop ineligible for listing in the CRHR for its architecture pursuant to Criterion C/3.⁹¹ However, the pro shop retains its integrity and has not been evaluated for listing in the NRHP or County Register or for listing in the CRHR pursuant to Criteria A/1, B/2, or D/4.

The pro shop has not undergone heavy renovations or changes and retains its integrity. The pro shop was one building that facilitated the use of the golf course for African-American players. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. The pro shop does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

Bridge

The original bridge located at the golf course is evident in a 1958 photograph (Figure 27, *View of Original Bridge [1958], Chester Washington Golf Course*). However, the golf course grounds underwent a major reconfiguration in 1962, and new bridges were constructed to make different regions of the golf course more accessible.⁹²

⁹¹ Harris, Brandy and Kelley Russell (Atkins). Letter to Joan Rupert (County). "CRHP Eligibility Assessment of the Chester L. Washington Golf Course Clubhouse." 13 August 2012. *Memorandum*.

⁹² Barry and Fernana. Department of County Engineer. "Pedestrian Bridges at Western—Ave Golf Course." December 1961. Sheet No. 1. Work Order No. 8818—20.



Figure 27. View of Original Bridge (1958), Chester Washington Golf Course
SOURCE: *Los Angeles County Department of Public Works, 1958*

One of the six bridges built at this time appears to remain standing near the grove of Eucalyptus trees (Figure 28, *Aerial View of Bridges [1965; Existing Bridge Outlined]*, Chester Washington Golf Course). This structure is located in the north-central region of the golf course (Figure 29, *View of Bridge Facing East, Chester Washington Golf Course*). The bridge is constructed of concrete with metal railings that project outward at each edge.



**Figure 28. Aerial View of Bridges (1965) (Existing Bridge Outlined),
Chester Washington Golf Course**

SOURCE: *County of Los Angeles Department of Parks and Recreation, 1965*



Figure 29. View of Bridge Facing East, Chester Washington Golf Course
SOURCE: *Sapphos Environmental, Inc., 2016*

The bridge has not undergone heavy renovations or changes and retains its integrity. The bridge is the last remaining of six structures from the 1962 landscaping of the golf course. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. The bridge does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

Comfort Station No. 2

Located in the southwestern corner of the golf course, comfort station no. 2 was likely constructed in 1957 alongside the concession stand (Figure 30, *View of Comfort Station No. 2, Chester Washington Golf Course*). Comfort station No. 2 measures 1,442 square feet and has a rectangular floor plan. Constructed of concrete masonry units (CMUs) the building has a raised, low-pitched gable roof with a central concrete ridge pole and exposed rafter tails. Projecting CMUs on each corner imitate quoins. Entrances flank each end of the building. H.L. Architects likely designed the comfort station.



Figure 30. View of Comfort Station No. 2, Chester Washington Golf Course
SOURCE: Sapphos Environmental, Inc., 2016

Comfort station No. 2 has not undergone heavy renovations or changes and retains its integrity. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. Comfort station No. 2 does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

Concession Stand

The Mid-Century Modern-style concession stand was designed and constructed in 1957 of CMUs (Figure 31, *Design for Concession Stand [1957], Chester Washington Park*). With a square footprint, the concession stand's complex shape is created from its slightly slanted flat asymmetrical roof situated to project over each secondary façade of the building, rather than the typical corners (Figure 32, *View of Concession Stand, Chester Washington Golf Course*). Exposed ridge poles hold the roof and accentuate the building's abstracted form. Projecting metal sheaves create counters below concession windows. The concession stand was constructed by H.L. Architects.

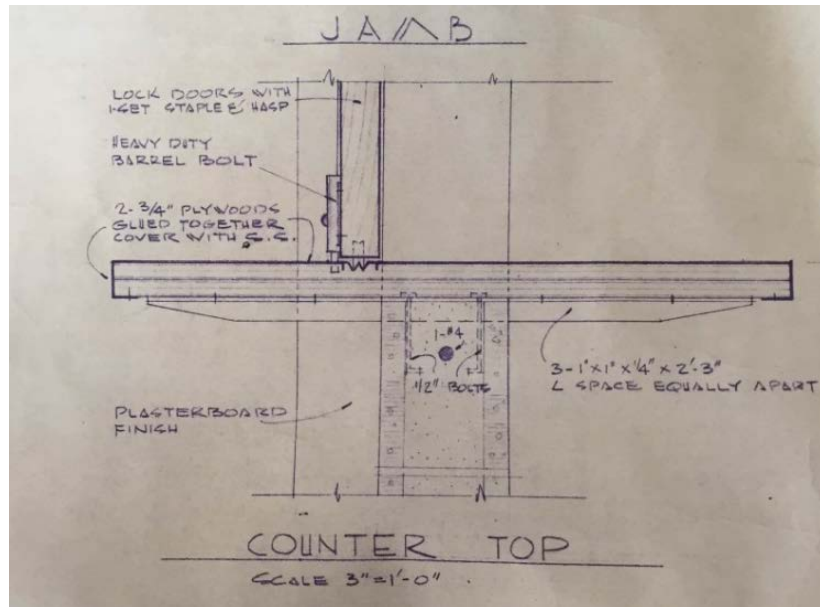


Figure 31. Design for Concession Stand (1957), Chester Washington Park
 SOURCE: County of Los Angeles Department of Parks and Recreation, 1957



Figure 32. View of Concession Stand, Chester Washington Golf Course
 SOURCE: Sapphos Environmental, Inc., 2016

The concession stand has not undergone heavy renovations or changes and retains its integrity. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. The concession stand does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

Fairways and Greens

Chester Washington Golf Course was opened in 1928 as the La Avenida Golf Course, although landscaping began in 1926. The areas of play were originally part of a 1,500 acre ranch owned by the O.T. Johnson Corporation from the early 20th century.⁹³ O.T. Johnson allotted 120 acres for a golf course in the area, and the course was designed by John Dunn.⁹⁴ It was acquired by the County in 1954 (Figure 33, *View of Areas of Play [1958], Chester Washington Golf Course*).



Figure 33. Views of Areas of Play (1958), Chester Washington Golf Course
SOURCE: *Los Angeles County Department of Public Works, 1958*

The areas of play have been subject to multiple modifications. In 1961, Fernan and designed pedestrian bridges, only one of which still exists.⁹⁵ In 1974, G.L. Polon completed drainage improvements for the golf course.⁹⁶ Electrical plot plan for driving range lighting was completed in 1977.⁹⁷ In 1988, County Department and Department of Facilities management approved design for general improvements at Chester Washington Golf Course.⁹⁸ The golf course saw a new waterscape system in 1992.⁹⁹ The landscaping of the greens has been replaced over the course of time due to the natural senescence cycles of plants. Therefore, excluding the bridge, it is not eligible for listing in the NRHP, CRHR and County Register pursuant to Criteria A/1, B/2, C/3, or D/4.

⁹³ Jackson, Philip. Letter to Ray Dortch. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." 17 January 1978.

⁹⁴ Wexler, Daniel. "History in the Making." 9 April 2007. *Los Angeles Times*. <http://www.latimes.com/sports/la-sp-history9apr09-story.html>

⁹⁵ Barry and Fernana. Department of County Engineer. "Pedestrian Bridges at Western—Ave Golf Course." December 1961. Sheet No. 1. Work Order No. 8818—20.

⁹⁶ G.L. Polon. Department of the County Engineer. "Western Ave Golf Course Drainage Improvements." August 1974.

⁹⁷ Architect. "Western Avenue Golf Course Driving Range Lighting." November 1977. Work Order No. 4101—82.

⁹⁸ Los Angeles County Facilities Management Department and Department of Parks and Recreation. August 8, 1988. "Chester Washington Golf Course Improvements: Phase II."

⁹⁹ O.D.R. "Waterscape System Construction Details." 12 May 1992.

Chester Washington Golf Course

Chester Washington Golf Course is a property with exceptional historical significance as the site of an important political and cultural event in the history of the African-American golfers in the state of California. Originally the La Avenida Golf Course, then the Western Avenue Golf Course, the facility served as the first major golf course to be integrated after racial discrimination leading into the 1950s. Previously hosting a Caucasian-only golf club, Western Avenue Golf Course was forced to diversify their golf course, opening it to players of color after the County purchased it. The golf course later served as a home field for many professional African-American golfers. Therefore, Chester Washington Golf Course is eligible for listing as a potential historic district in the CRHR and County Register pursuant to Criteria 1 for its association with the integration of minority golf players in the Los Angeles region.

A number of incredibly notable African-American activists and golfers forced social change at Chester Washington Golf Course. Maggie Hathaway, a noted civil rights advocate, brought attention to the Western Avenue Women's Golf Club when they rejected her bid for membership because she was black. Hathaway fought until the club was exiled from the golf course, formed her own people of color-inclusive golf club, and advocated for an integrated golf course. African-American golfers began to pour into the Western Avenue Golf Course, including notable African-American golfers such as Charlie Sifford, Ted Rhodes, and Joe Louis. Many of these golfers were involved at the golf course during the height in their careers, and lauded the facility's inclusive atmosphere. Therefore, Chester Washington Golf Course is eligible for listing as a potential historic district in the CRHR and County Register pursuant to Criteria 2 for its connection with a number of notable local and national African-American golfers that broke the previously restricted sport and paved the way for later sportsmen like Tiger Woods.

Chester Washington Golf Course was not designed by a master architect, and is not noted for its landscape design or for its unique landscape features. The concept of the design is utilitarian in execution, and does not reflect a historic trend or school of thought. Rather, Chester Washington Golf Course is a common example of this resource type. Therefore, Chester Washington Golf Course does not embody the distinctive characteristics of a type, period, or method of construction. The golf course, inclusive of the appurtenant buildings, facilities, and landscape, is not eligible for listing in the NRHP, CRHR, or County Register pursuant to Criterion C/3.

Chester Washington Golf Course was constructed using common and utilitarian materials and does not have the potential to yield information regarding local building traditions and methods. Therefore, Chester Washington Golf Course, inclusive of the appurtenant buildings, facilities, and landscape, is not eligible for listing in the NRHP, CRHR, or County Register pursuant to Criterion D/4.

Much of Chester Washington Golf Course has not been altered since the construction of the clubhouse in 1965; only the clubhouse itself has undergone renovation. Therefore, the setting, buildings, and structures retain sufficient historic integrity and meet the criteria for listing as a historic district because of their association with the integration of Los Angeles golfing communities and with notable African-American golfers in the CRHR and County Register pursuant to Criteria 1 and 2. The period of significance is from 1954 to 1967 when the golf course was constructed and notable African-American golfers were active at the site.

SECTION 7.0 CONCLUSION

Chester Washington Golf Course, inclusive of the appurtenant buildings and structures, meets the criteria to be treated as a historical resource pursuant to Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines. The setting, buildings, and structures retain sufficient historic integrity and meet the criteria for listing as a historic district for their association with integrated golfing and notable African-American golfers and activists including Maggie Hathaway, Charles “Charlie” Sifford, and Ted Rhodes (Appendix E, *DPR 523 Forms*). Chester Washington Golf Course is eligible for listing on the California Register of Historical Resources and the County of Los Angeles Register of Landmarks and Historic Districts.

In general, the resources at Chester Washington Golf Course are significant for their association with an event and people, not for their architecture, yet still need to be protected as they contribute to the conveyance of that significance. In general, the structure and building resources found significant at Chester Washington Golf Course can be preserved with common methods of careful maintenance, but may also benefit by guidance from the Secretary of the Interior’s *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* and related U.S. National Park Service *Preservation Briefs Nos. 1, 4, 6, 15, and 47* (Appendix F, *National Park Service Preservation Briefs*).¹

In addition to the significance evaluation, a review of the record search was conducted to ensure that any recorded archaeological sites within or near Chester Washington Golf Course was considered. One archaeological study has been conducted within the golf course boundaries. Six archaeological studies have been conducted exclusively within the 0.25-mile buffer zone. No unique archaeological resources, as defined in Section 21083.2 of the Public Resource Code, have been identified within or near Chester Washington Golf Course.

Although a record search was completed, a Phase I Pedestrian Survey to assess the presence or absence of archaeological resources was not completed. Generally, in existing developed parks or golf courses, native soils will be several feet below grade due to prior excavation and grading activities that were conducted for constructing buildings and structures, irrigation, and landscaping. Projects that can be reviewed pursuant to a CEQA Categorical Exemption would not likely create an unusual circumstance with regard to archaeological resources unless a project requires grading and excavation of native soils not disturbed during construction, maintenance, and operation of the park or golf course. Any work that involves earth-moving activity in previously undisturbed native soils should be monitored by, at minimum, workers that have received cultural resource training pursuant to a cultural resources management plan and worker education and awareness program.

Currently, Los Angeles County has a limited number of open spaces; therefore, effective planning and the salvage of historical resources are crucial. Based on this evaluation, it is anticipated that future renovations proposed by the County of Los Angeles Department of Parks and Recreation would not result in impacts to historical resources with implementation of the previously identified *Preservation Briefs* in accordance with the Secretary of the Interior’s *Standards for the Treatment of Historic Properties*.

¹ “Preservation Briefs.” U.S. National Park Service. Available at: <https://www.nps.gov/tps/how-to-preserve/briefs.htm>

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APPENDIX A
RESUMES OF KEY PERSONNEL

Marie C. Campbell, MA

Principal

Certified Wetland Delineator

MA, Geography, Geomorphology/
Biogeography, UCLA

- Ensure technical and procedural adequacy pursuant to NEPA, CEQA, and other federal, state, and local statutes and regulations
- Agency coordination
- Coordination with special interests
- Identify opportunities for issue resolution
- Public outreach
- Quality assurance / quality control

Years of Experience: 30 +

Relevant Experience:

- SCAG 2015 RTP/SCS PEIR
- Union Station Master Plan PEIR
- Martin Luther King Jr. Medical Center Campus EIR
- St. John's Wellness Center EA
- Arroyo Seco Master Plan EIR/CE
- Grand Avenue Realignment and Music Center Improvement Project EIR/CE
- Plaza de Cultura y Artes EIR/CE
- Hollywood Bowl Acoustical Shell Replacement Project EIR
- KROC Community Center EIR
- Kenneth Hahn Regional Park Ballfield Complex EIR
- Rehabilitation and Adaptive Reuse of Boddy House Garage CE
- Bosque del Rio Hondo MND/EA
- College Park Mixed Use EIR
- China Shipping Yard EIS/EIR
- ROEN Development Section 8 Housing CE
- Marina del Rey Affordable Housing Policy MND
- County Ordinance to Ban Single-use Carryout Plastic Bags EIR and Subsequent Addendum EIRs for five cities
- Bellingham School and 4th Avenue School EIRs

Ms. Marie Campbell, owner of Sapphos Environmental, Inc., is an environmental compliance specialist with more than 30 years of experience in managing environmental documents prepared pursuant to National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) for projects involving complex community development and infrastructure issues. Ms. Campbell has served as the principal-in-charge for a wide range of other projects including transportation, community development, and healthcare projects.

Ms. Campbell serves as the principal-in-charge providing strategic environmental compliance oversight and quality assurance for the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy Program EIR, a comprehensive document that evaluates transportation improvement projects and land use patterns for six counties and 191 cities in the SCAG region. Ms. Campbell serves in a comparable capacity for LA Metro's Union Station Master Plan EIR and the Doran Grade Street Separator SE/CE. She has also provided environmental compliance services for the Crenshaw/LAX and Regional Connector transit corridor projects, including SWPPP oversight, archaeological and paleontological monitoring, evaluation of historic structures, and noise and vibration monitoring.

Having started her career as an Environmental Compliance Specialist with the U.S. Army Corps of Engineers, she has an extensive background in NEPA, as well as CEQA, and has overseen documents for a variety of community development projects, including mixed use projects, schools, community facilities, and parks. She served as the project manager for the College Park Mixed-Use project EIR, Keeler Dunes Dust Control Project EA/EIR, the Plaza de Cultura y Artes EIR/CE, the KROC Community Center EIR, Lennox Section 8 housing CE, and the Music Center Annex CE. Many of these community development projects have involved rights-of-way on federal lands, or the use of federal funds, including the Department of Housing and Urban Development, Federal Highway Administration, and Federal Railroad Administration. She has served as project manager for the Arroyo Seco Master Plan EIR, the Grand Avenue Realignment Project EIR/CE, the Hollywood Bowl EIR, the Kenneth Hahn Regional Park EIR, and the Bosque del Rio Hondo MND/EA. For each of these projects, Ms. Campbell directed the organization and scope of the environmental analysis, provided quality assurance for written work products, conducted the public outreach meetings, agency coordination, and made public presentations before the respective decision-making body.

She served as the principal-in-charge for the Martin Luther King Jr. Medical Center EIR to facilitate reopening of an interim Outpatient Hospital and construction of the Multi-Service Ambulatory Care Center, in the wake of a controversial closure of the facility that left a large area of south central Los Angeles with compromised accessibility to healthcare, particularly emergency medical services. She served in a comparable capacity for the St. John's Wellness Center EA and the Long Beach Memorial Medical Center EIR.

Ms. Campbell is recognized by the LA Bar Association as an expert witness for NEPA and CEQA. The majority of projects for which environmental compliance documentation has been prepared have not involved litigation; however, in each of the 13 cases (on 11 projects) that were litigated, Sapphos Environmental, Inc.'s client prevailed and was able to proceed with the project as analyzed. She serves on the board of the National Association of Environmental Professionals and the California Association of Environmental Professionals.

Carrie E. Chasteen, MS, BA

Senior Historic Resource Specialist

MS, Historic Preservation,
School of the Art Institute of
Chicago, Chicago, IL

BA, History and Political
Science, University of South
Florida, Tampa, FL

Phi Alpha Theta historical honor
society

- Cultural resources management and legal compliance
- History of California
- Identification and evaluation of the built environment
- Historic American Building Survey (HABS) and Engineering Record (HAER) documentation
- Historic Property Survey Reports (HPSRs)
- Historical Resources Evaluation Reports (HRERs)

Years of Experience: 15+

Relevant Experience

- Certified Oregon Transportation Investment Act (OTIA) III CS3 Technical Lead
- Historic Preservation Commissioner, City of Pasadena, CA
- Historic consultant for the Shangri La Hotel renovation project, Santa Monica, CA
- Principal Architectural Historian for the Interstate 10 (I-10) Corridor Project
- HABS/HAER documentation for Mission Control at NASA JPL in Pasadena, CA

Ms. Carrie Chasteen has more than 15 years of experience in the field of cultural resources management and the built environment, including project management, agency coordination, archival research, managing large surveys, preparation of Environmental Impact Statement / Environmental Impact Report (EIS/EIR) sections, peer review, and regulatory compliance. She meets and exceeds the Secretary of the Interior's *Professional Qualification Standards* in the fields of History and Architectural History.

Ms. Chasteen has served as Principal Investigator / Principal Architectural Historian on projects in Kern, San Bernardino, Riverside, Ventura, Los Angeles, Orange, Imperial, and San Diego Counties in Southern California. She has extensive experience with the California Office of Historic Preservation, the California Department of Transportation (Caltrans), San Bernardino Associated Governments (SANBAG), Los Angeles County Department of Parks and Recreation, the City of Los Angeles, and various other State, county, and local government agencies.

Ms. Chasteen served as the historic consultant for the design team for the renovation of the Shangri La Hotel, Santa Monica, California, which won a historic preservation award from the Santa Monica Conservancy. For the Shangri La Hotel project, Ms. Chasteen documented and ranked the character-defining features of the building and structures on the property; reviewed plans for consistency with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*; assisted with developing creative solutions to meet the objectives of updating the hotel amenities while maintaining the historic character of the building; assisted with the entitlement process including presentations before the Planning Commission; and prepared Historic American Building Survey (HABS) documentation of the linoleum flooring which was set in unique patterns per room throughout the entire building. Additional experience includes serving as Principal Architectural Historian for the Interstate 10 (I-10) Corridor Project. For this project, Ms. Chasteen prepared a Historic Property Survey Report (HPSR), Historical Resources Evaluation Report (HRER), and a Finding of No Adverse Effect with Non-Standard Conditions (FNAE). As part of the FNAE, she conducted agency consultation with the Cities of Redlands, Upland, and Ontario, and with other interested parties including regional historical societies. Ms. Chasteen has also prepared Historic American Buildings Survey / Historic American Engineering Record (HABS / HAER) documentation for the former Caltrans District 7 headquarters building and the Space Flight Operations Facility, commonly referred to as Mission Control, a National Historic Monument, at the Jet Propulsion Laboratory (JPL) in Pasadena.

Ms. Chasteen is a member of the Society of Architectural Historians, National Trust for Historic Preservation, California Preservation Foundation, and Pasadena Heritage. Ms. Chasteen is also a Historic Preservation Commissioner for the City of Pasadena.

Alexandra I. Madsen, MA, BA

Senior Architectural Historian

MA, Art History, University of Texas at Austin, Austin, TX

BA (Magna Cum Laude), History, Saint Anselm College, Manchester, NH

- Cultural resources management and legal compliance
- Identification and evaluation of the built environment
- Archival documentation
- Historic preservation consultation
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- CEQA cultural resources analysis

Years of Experience: 5+

Relevant Experience

- Los Angeles County Department of Parks and Recreation Series 523 forms
- Los Angeles Unified School District Design Review Reports
- Historic American Buildings Survey Report and Pamphlet
- Historic Evaluations

Ms. Alexandra Madsen, Senior Architectural Historian for Sapphos Environmental, Inc., has over five years of experience in the field of cultural resource management including experience in historic institutions, museums, and firms. Ms. Madsen has a Master's Degree in Art History from the University of Texas at Austin, where she focused on built environments. She meets and exceeds the Secretary of the Interior's *Professional Qualification Standards* in History and Architectural History.

Ms. Madsen has experience in completing cultural resources reports and in evaluating properties under federal, State, and local criteria. She has surveyed, conducted research on, and evaluated over 20 Los Angeles County Parks. This work includes archival research, identification and evaluation reports, and Department of Parks and Recreation (DPR) Series 523 Forms. Ms. Madsen has also evaluated educational institutions for the Los Angeles Unified School District (LAUSD) as well as individual residential and commercial properties for various cities. This work required preparation of reports to demonstrate compliance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties (Standards)*, preparation of DPR 523 series forms, and in some cases scoping for Environmental Impact Reports (EIR). She has worked on historic projects located in Los Angeles, Orange, and Kern Counties. She is experienced with the Secretary of the Interior's *Standards* and CEQA compliance.

Ms. Madsen comes from a background specializing in historical and pre-historical artifacts and resources. She has worked in research, curatorial, collections management, and educational capacities. As a senior student assistant at the UT Dolphe Briscoe Center for American History, curatorial assistant at Gunn Memorial Historical Museum, and research intern at the Institute for American Indian Studies, Ms. Madsen was responsible for collections management and archival work. Moreover, she has participated in archaeological excavations in Italy and Connecticut.

Ms. Madsen is a member of the National Trust for Historic Preservation, California Preservation Foundation, L.A. Conservancy, Pasadena Heritage, and Highland Park Heritage Trust.

Donald M. Faxon, MA, BS

Architectural Historian Preservation Specialist

MA, *Historic Preservation,
Savannah College of Art &
Design, Savannah, GA*

BS, *Public Communications,
Boston University, Boston,
MA*

- *Cultural resources management and legal compliance*
- *History of California*
- *Identification and evaluation of the built environment*
- *Archival documentation*
- *Historic preservation consultation*
- *Historic treatment planning, monitoring, and management.*
- *ADA assessment*
- *Historic structure reports and conditions assessment*
- *Scientific materials evaluation*
- *Architectural history*

Years of Experience: 25 +

- *Society of Architectural Historians*
- *Former Cultural Heritage Commissioner, City of Sierra Madre*
- *Sigma Pi Kappa Historic Preservation Fellowship*
- *Former Historical Architect at a State Historic Preservation Office (SHPO)*
- *Section 106 reports*

Donald M. Faxon has professional experience as both an Architectural Historian and Architectural Preservation Specialist. He served as Senior Historical Architect at a state office of historic preservation (SHPO) and as a city Cultural Heritage Commissioner; and has worked for the National Park Service and the National Trust for Historic Preservation. He has explained, interpreted, applied, and/or enforced the Secretary of the Interior's Standards in positions on both coasts. His experience includes providing inventory, significance evaluations, re-use studies, and interpretation options. He also provides architectural technical expertise in design review, visual and scientific condition assessments, preservation and conservation treatments, historic structure reports, project monitoring, compatible integration design for code required elements, and accessibility planning for the disabled. Additional skills include architectural project planning and monitoring. He has prepared technical reports for historical built environment resources to satisfy compliance requirements under CEQA, Section 106, and local ordinances.

Mr. Faxon has more than 25 years of experience as a historic preservation professional on projects involving a wide variety of building, structure and landscape styles and types, including agricultural, maritime, industrial, residential, commercial, transportation, civic, religious, entertainment, and military related resources.

Mr. Faxon's selected project experience includes:

- Secretary of the Interior's Standards Conformance Review for Los Angeles Unified School District's Lincoln High School HVAC Project.
- Evaluation and recommendations for properties owned by the Preservation Society of Newport County (The Newport Mansions) for Americans with the Disabilities Act (ADA) accessibility, Newport, RI.
- Secretary of the Interior's Standards evaluation of "Old State House" buildings and other properties owned by the State Government of Rhode Island for repair, restoration, and ADA accessibility, Providence, RI, including design recommendations and implementation.
- Evaluation of the state-owned Veteran's Auditorium in Providence, RI for ADA accessibility.
- Evaluations and historic contexts for multiple County parks for the Los Angeles Department of County Parks and Recreation, including assessment for the NRHP, SRHP, and County Register.
- Cultural Resource Management Plan research and preparation for the Los Angeles Department of County Parks and Recreation.
- CEQA evaluation of historical significance and design review of a proposed rehabilitation, San Luis Obispo, CA.
- Administration and monitoring of Congressionally-funded seismic disaster grant projects at Castle Green Apartments, Pasadena, CA; Shrine Auditorium, 665 Western Boulevard, Los Angeles, CA; and Case Study House Number 18, 199 Chautauqua Blvd, Pacific Palisades, CA.
- Field evaluations and recommendations for endangered properties at Rocky Mountain National Park, CO.

APPENDIX B

RECORD SEARCH RESULTS, CHESTER WASHINGTON GOLF COURSE*

*Appendix B, *Record Search Results, Chester Washington Golf Course* has been provided to the County of Los Angeles as a separate .ZIP file.

Appendix B, *Record Search Results, Chester Washington Golf Course* ("Submitted Record") is designated confidential and must be managed as confidential, pursuant to California Government Code § 6254(r). The Submitted Record must be managed as confidential information by the County of Los Angeles to protect cultural resources from risk that the information could be used to loot, vandalize, or otherwise damage sensitive cultural, archaeological, or paleontological resources. The Submitted Record contains sensitive information related to cultural, archaeological or historical objects, structures, landscapes, resources, sacred places, or sites of concern to local Native Americans or other ethnic groups, or resources or objects described in California Public Resources Code §§ 5097.9 or 5097.993. The Submitted Record may not be released to the public. The submitted record is provided to the County, limited to use by those in a "need to know" position for use in ongoing operations and maintenance activities, and advance planning effort.

APPENDIX C
SAPPHOS ENVIRONMENTAL, INC. SOURCES*

*Appendix C, *Sapphos Environmental, Inc. Sources* has been provided to the County of Los Angeles as a separate .ZIP file.

APPENDIX D

***COUNTY OF LOS ANGELES DEPARTMENT OF
PARKS AND RECREATION SOURCES***

REFERENCE MATERIALS*

- "Golf Course renamed." 20 January 1982. Inglewood Hawthorne Wave (Los Angeles, CA). (C Washington Golf-1.pdf, pg. 1-2)
- American Architects Directory. 1970. "Nielsen." (Nielsen, Moffatt, Wolverton.pdf)
- Chester Washington Golf Course fact sheet. (doc20160907140721.pdf)
- County of Los Angeles Department of Parks and Recreation. 18 March 1982. Chester L. Washington Golf Course Dedication program. (Los Angeles, CA). (C Washington Golf-1.pdf, pg. 3)
- County of Los Angeles Department of Parks and Recreation. 30 November 1967. "Screen Actor to Star as Professional Golfer." (C Washington Golf-1.pdf, pg. 13)
- County of Los Angeles Department of Parks and Recreation. n.d. "Landscaping of Western Avenue Center Islands Starts." (C Washington Golf-1.pdf, pg. 14)
- County of Los Angeles Department of Parks and Recreation. n.d. Chester Washington Golf Course timeline and history. (Western Avenue Golf.pdf)
- Harris, Brandy and Kelley Russell, Atkins. 13 August 2012. Memo to Joan Rupert, County of Los Angeles Department of Parks and Recreation. Subject: CRHP Eligibility Assessment of the Chester L. Washington Golf Course Clubhouse, Los Angeles, Los Angeles County, California. (Chester_Washington_Clubhouse_Memorandum.pdf)
- Hathaway, Maggie. 6 April 1972. "Tee Time: Junior Putting Green." *Los Angeles Sentinel*. (C Washington Golf-1.pdf, pg. 12)
- Jackson, Philip. 17 January 1978. Memo to Ray Dortch. Subject: History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974. (C Washington Golf-1.pdf, pg. 5)
- Nielsen Sr, Riender.pdf
- San Pedro Chamber of Commerce Civic Affairs Committee. 9 January 1967. "Progress and This is Only the Beginning." (C Washington Golf-1.pdf, pg. 17)
- Woods, Charles A. 29 May 1967. Memo to E.R. Haines. Subject: Beautification of Center Island on Western Avenue in San Pedro. (C Washington Golf-1.pdf, pg. 15)

PHOTOGRAPHIC MATERIALS*

- Eleven (11) historical photos dated 1964 or 1965 from the Los Angeles County CEO Photo Unit
- Twenty-six (26) historical photos dated 1958, 1962, or 1965 from the Los Angeles County Department of Public Works
- One hundred twenty-six (126) general photos dated 2010 and 2012, and one (1) undated historical photo from the County of Los Angeles Department of Parks and Recreation

*Additional files were pulled from the County of Los Angeles Department of Parks and Recreation Chester Washington Golf Course archives.

APPENDIX E
DPR 523 FORMS

**State of California — Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
DISTRICT RECORD**

**Primary #
HRI #
Trinomial #**

Page 1 of 19

***NRHP Status Code:** 3CD; 5D3

***Resource Name or #** (Assigned by recorder): Chester Washington Golf Course

D1. Historic Name: La Avenida Golf Course; Western Avenue Golf Course

D2. Common Name: Chester Washington Golf Course

***D3. Detailed Description** (Discuss overall coherence of the district, its setting, visual characteristics, and minor features. List all elements of district.):

Chester Washington Golf Course is located in West Athens, a census-designated area of Los Angeles located in the Second Supervisorial District of Los Angeles County. Chester Washington Golf Course is located in the Coastal Plain of the Los Angeles Central Basin. (See *Continuation Sheet page 4*)

***D4. Boundary Description** (Describe limits of district and attach map showing boundary and district elements.):

The golf course is located in a transitional area between commercial and residential land uses; there are commercial land uses to the west, and single-family residences to the north, east, and south. The golf course is bounded to the north by Charlie Sifford Drive, to the east by single-family residences and Henry Clay Middle School on S. Western Avenue, to the south by single-family and multi-family residences on El Segundo Boulevard, and to the west by commercial buildings on Van Ness Avenue.

***D5. Boundary Justification:**

The park occupies approximately 125 acres on two parcels owned by the county of Los Angeles (AINs 4057-032-901 and 4057-032-900).

D6. Significance: Theme: County Golf Course

Area: West Athens

Period of Significance: 1954–1967

Applicable Criteria: 1, 2

(Discuss district's importance in terms of its historical context as defined by theme, period of significance, and geographic scope. Also address the integrity of the district as a whole.)

The land that is now Chester Washington Golf Course was part of a 1,500-acre ranch owned by the O.T. Johnson Corporation from the early 20th century. O.T. Johnson allotted 120 acres for a golf course in the area, and the course was designed by John Dunn.¹ No information is available on John Dunn or any other architects or designers who may have been associated with the development of the golf course. Landscaping began in 1926 and grass, likely in the form of grass seed, for the golf course was transported from the state of Washington in refrigerated sacks. (See *Continuation Sheet page 4*)

***D7. References** (Give full citations including the names and addresses of any informants, where possible):

See *Continuation Sheet page 8*.

***D8. Evaluator:** Alexandra Madsen

Date: February 14, 2017

Affiliation and Address:

Sapphos Environmental, Inc.
430 North Halstead Avenue
Pasadena, California 91107

¹ Wexler, Daniel. "History in the Making." 9 April 2007. *Los Angeles Times*.
<http://www.latimes.com/sports/la-sp-history9apr09-story.html>

State of California — Natural Resources Agency
 DEPARTMENT OF PARKS AND RECREATION
 LOCATION MAP

Primary #
 HRI#
 Trinomial

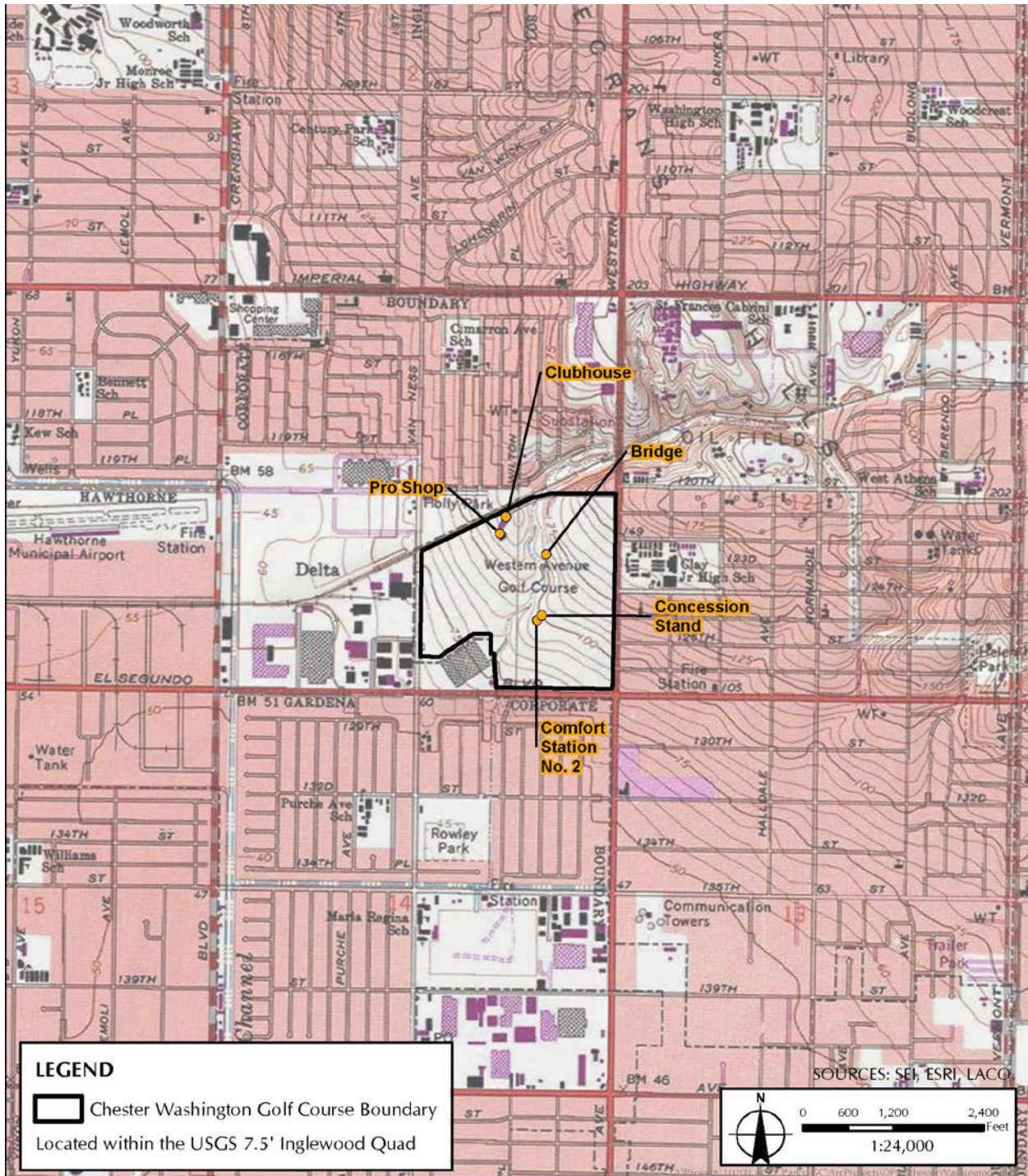
Page 2 of 19

*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

*Map Name: Inglewood

*Scale: 1:24,000

*Date of map: 1981



State of California — Natural Resources Agency
 DEPARTMENT OF PARKS AND RECREATION
 SKETCH MAP

Primary #
 HRI#
 Trinomial

Page 3 of 19

*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

Drawn by: Sara Nava

*Date of map: January 9, 2017

Sketch Map:



State of California — Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #
HRI #
Trinomial

Property Name: Chester Washington Golf Course
Page 4 of 19

***D3. Detailed Description:** (Continued from District Record page 1)

The Coastal Plain region is characterized by a series of mountain ranges and northwest trending sediment-filled valleys, subparallel to faults branching from the San Andreas Fault. Chester Washington Golf Course is gently sloping with elevations ranging from approximately 67 feet above mean sea level (msl) at the southwest corner of the park to 160 feet above msl at the northeast corner of the park. Chester Washington Golf Course is managed by the County of Los Angeles Department of Parks and Recreation.

D6. Significance: (Continued from District Record page 1)

On March 11, 1928, the golf course officially opened as the La Avenida Golf Course. The Avenida Golf Club was organized in 1930 by 15 golfers who voted William Hunter president.²

In 1931, the name of the golf course was changed to Western Avenue Golf Course, and by 1953 there were over 300 members of the golf club. At this time, the golf course mostly had a number of smaller buildings; a 1930 historical aerial shows a smattering of small buildings with square footprints. One of these buildings likely survived to the 1960s, as seen in a 1965 aerial photograph, but was demolished at an unknown date.

Golf, like many other sports in America, was originally integrated before a "Caucasian-only" clause was adopted. The first African-American to play golf was John Shippen Jr., who competed in the 1896 Second U.S. Open at Shinnecock Hills, in which he registered as Native American.³ Although other tournament competitors originally protested his participation, PGA members eventually relented and played alongside him. Shippen played in six U.S. Opens, finishing in fifth place in 1896 and 1902 before retiring in 1924. The PGA "Caucasian-only" clause was adopted in 1934. The United Golf Association, formed by Robert Hawkins, ultimately established a tour for players excluded from PGA events.⁴

The year 1948 was a time for many firsts in American golf. One occurred at Western Avenue Golf Course during the June 21, 1948 tournament, which marked the first time in the west that women were able to compete in an open tournament with male golfers.⁵ That same year, African-American golfers Teddy Rhodes, Bill Spiller, and Madison Gunter sued their way into the U.S. Open, claiming their livelihoods were being denied by the PGA based on race.⁶ The PGA agreed to invite them to their top tournaments and the lawsuit was dropped. Rhodes fought his way into 69 PGA events, and began a crusade against racism in professional golf that would burn through Western Avenue Golf Course. (See Continuation Sheet page 5)

² Jackson, Philip. Letter to Ray Dortch. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." 17 January 1978.

³ Denney, Bob. "John Shippen Jr.: African American Pioneer; first American-born golf professional." 2 February 2015. *Professional Golfers Association*. <http://www.pga.com/news/pga/john-shippen-jr-first-African-American-golf-professional>

⁴ "Timeline of African American achievements in golf." 4 February 2011. *Professional Golfers Association*. <http://www.pga.com/timeline-African-American-achievements-in-golf>

⁵ "Male and Female Golf Meet Scheduled Here June 21st." 17 June 1948. *Los Angeles Sentinel*.

⁶ Lewis, Jason. "Black History Month: The First Black Golfers." 3 February 2012. *Los Angeles Sentinel*. <https://lasentinel.net/black-history-month-the-first-black-golfers.html>

State of California — Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #
HRI #
Trinomial

Property Name: Chester Washington Golf Course
Page 5 of 19

D6. Significance: *(Continued from Continuation Sheet page 4)*

One reason the Western Avenue Golf Course became so embroiled in the integration of golf in Los Angeles is because of its change in ownership. In 1953, the Western Avenue Golf Course came under threat of real estate subdivision. County Supervisor Kenneth Hahn argued that the golf course should be saved and the County shortly thereafter acquired it in 1954.⁷

Controversy surrounded the Western Avenue Golf Course in 1955, when Maggie Hathaway, an African-American social activist, applied for membership to the course's Women's Golf Club.⁸ The Caucasian-only group denied her application and Hathaway brought up the matter with Supervisor Kenneth Hahn.⁹ Hathaway argued that the association was not allowed to discriminate based on race when practicing on County-owned land, which she and other minorities paid taxes to help maintain. Hahn agreed, and the group was expelled from the golf course. He extended the ban throughout the County, forcing all-white golf groups to diversify and admit people of color golfers.¹⁰ A nondiscrimination clause was added to County Department facilities contracts:

*Concessionaire agree that he shall not make any discrimination, distinction, or restriction on account of color, race, religion, ancestry, or national origin contrary to the provisions of Section 51 of the Civil Code of the State of California which is incorporated herein by reference as if set forth here at in full.*¹¹

Western Avenue Golf Course became integrated and many notable African-American golfers, such as Charles Sifford, consecutively and consistently practiced at the golf course during the height of their careers.

In 1955, Charles "Charlie" Sifford and Ted Rhodes were the first African-American golfers to play at the Gardena Valley Open Golf Tournament held at Western Avenue Golf Course.¹² Sifford was the first African-American to be admitted on a PGA Tour, joining the 1960 season. He won the 1967 Greater Hartford Open Invitational, the 1969 Los Angeles Open, and the 1975 PGA Seniors' Championship.¹³ *(See Continuation Sheet page 6)*

⁷ County of Los Angeles Department of Parks and Recreation. "Annual Report: Fiscal Year." 30 June 1954. Board of Supervisors

⁸ Clark, Libby. "A 'Taste' of History- A Remembrance." 10 April 2003. *Los Angeles Sentinel*.

⁹ Dailey, John. "Divot Diggings: Maggie's Struggle Not a Piece of Cake." 27 October 1994. *Los Angeles Sentinel*.

¹⁰ Clark, Libby. "A 'Taste' of History- A Remembrance." 10 April 2003. *Los Angeles Sentinel*.

¹¹ Dailey, John. "Divot Diggings: Maggie's Struggle Not a Piece of Cake." 27 October 1994. *Los Angeles Sentinel*.

¹² "Ted Rhodes, Charles Sifford Will Play in Golf Meet Here." 17 November 1955. *Los Angeles Sentinel*.

¹³ "Timeline of African American achievements in golf." 4 February 2011. Professional Golfer's Association. Available at: <http://www.pga.com/timeline-African American-achievements-in-golf>

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DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #
HRI #
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Property Name: Chester Washington Golf Course
Page 6 of 19

D6. Significance: (Continued from Continuation Sheet page 5)

In 2004, Sifford was the first African-American to be enshrined in the World Golf Hall of Fame. In 2015, President Barack Obama honored him with the nation's highest civilian honor, the Presidential Medal of Freedom.¹⁴ Sifford was recognized for his success at the golf course in 2015, when 120th Street was changed to Charlie Sifford Drive in his honor. His son, Charles Sifford Jr., accepted a duplicate of the street sign from County Supervisor Mark Ridley-Thomas.

Ted Rhodes, the player that sued his way into the U.S. Open in 1948, was another notable golfer that frequented Western Avenue Golf Course. Rhodes was recognized as the first African-American professional golfer, and went on to mentor Charlie Sifford. Debbie Rhodes, his daughter, remarked of the golf course: "It is not often as blacks that we get to talk about a place of fond memories and lasting friendships. Where black golfers got a start at making a name for themselves. This is what Chester Washington Golf Course (formerly Western Avenue Golf Course) meant to my father [Ted Rhodes]."¹⁵

Other notable African-American golfers who practiced at the golf course on a regular basis include: Alton Duhon, Charlie Lee, Bill Spiller, Jim Brown, and heavy-weight boxer Joe Louis.¹⁶

In 1956, construction began on the original clubhouse, now the pro shop, which was completed by 1958. In the early 1960s, much of the golf course landscaping was redesigned, and six bridges were constructed. A clubhouse was designed by Nielsen, Moffatt & Wolverton in 1963 and constructed in 1965. Nielsen, Moffatt & Wolverton were located out of Los Angeles and designed a number of hospitals, medical centers, and post offices.¹⁷

In March of 1972, the Minority Associated Golfers, with entertainment by the Jackson Five, dedicated the Junior Golfers Green. The event was notable for the musical group's surprise visit, in which the five singers and their baby brother Jackson doled out autographs.¹⁸

The golf course was renamed after newspaper magnate Chester L. Washington in 1982, a year before Washington's death. Chester L. Washington was an African-American newspaper magnate who started his career in Pittsburgh, Pennsylvania. After moving to Los Angeles, Washington served as the first African-American editor for the *Los Angeles Mirror-News* before taking a position as the editor of the *Los Angeles Sentinel*, the city's oldest black-owned weekly newspaper. In 1966, he bought the *Central News* and *Southwest News*, two weekly newspapers in South Los Angeles. Washington went on to purchase the five weekly *Wave* newspapers in 1971, eventually creating the 13-newspaper *Central News-Wave Publications*.¹⁹ (See Continuation Sheet page 7)

¹⁴ Wanlass, Don. "Sports Digest: Street Renamed in honor of Charlie Sifford." 20 August 2015. *Los Angeles Wave*. <http://wavenewspapers.com/sports-digest-street-renamed-in-honor-of-charlie-sifford/>

¹⁵ Dailey, John. "Washington Golf Course: Back to the Future." 26 June 1986. *Los Angeles Sentinel*.

¹⁶ Wexler, Daniel. "History in the Making." 9 April 2007. *Los Angeles Times*. <http://www.latimes.com/sports/la-sp-history9apr09-story.html>

¹⁷ "Nielsen, Moffatt & Wolverton." 1970. *American Architects Directory*.

¹⁸ Maggie Hathaway, "Tee Time: Jackson 5 Signs Charter," 16 March 1972, pg. B3.

¹⁹ Hernandez, Marita. "Head of Black-Owned Newspaper Chain Dies." 1 September 1983. *Los Angeles Times*.

State of California — Natural Resources Agency
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Primary #
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Property Name: Chester Washington Golf Course
Page 7 of 19

D6. Significance: *(Continued from Continuation Sheet page 6)*

Chester Washington Golf Course is a property with exceptional historical significance as the site of an important political and cultural event in the history of the African-American golfers in the state of California. Originally the La Avenida Golf Course, then the Western Avenue Golf Course, the facility served as the first major golf course to be integrated after racial discrimination leading into the 1950s. Previously hosting a Caucasian-only golf club, Western Avenue Golf Course was forced to diversify their golf course, opening it to players of color after the County purchased it. The golf course later served as a home field for many professional African-American golfers. Therefore, Chester Washington Golf Course is eligible for listing as a potential historic district in the CRHR and County Register pursuant to Criteria 1 for its association with the integration of minority golf players in the Los Angeles region. *(See Continuation Sheet page 7)*

A number of incredibly notable African-American activists and golfers forced social change at Chester Washington Golf Course. Maggie Hathaway, a noted civil rights advocate, brought attention to the Western Avenue Women's Golf Club when they rejected her bid for membership because she was black. Hathaway fought until the club was exiled from the golf course, formed her own people of color-inclusive golf club, and advocated for an integrated golf course. African-American golfers began to pour into the Western Avenue Golf Course, including notable African-American golfers such as Charlie Sifford, Ted Rhodes, and Joe Louis. Many of these golfers were involved at the golf course during the height in their careers, and lauded the facility's inclusive atmosphere. Therefore, Chester Washington Golf Course is eligible for listing as a potential historic district in the CRHR and County Register pursuant to Criteria 2 for its connection with a number of notable local and national African-American golfers that broke the previously restricted sport and paved the way for later sportsmen like Tiger Woods.

Chester Washington Golf Course was not designed by a master architect, and is not noted for its landscape design or for its unique landscape features. The concept of the design is utilitarian in execution, and does not reflect a historic trend or school of thought. Rather, Chester Washington Golf Course is a common example of this resource type. Therefore, Chester Washington Golf Course does not embody the distinctive characteristics of a type, period, or method of construction. The golf course, inclusive of the appurtenant buildings, facilities, and landscape, is not eligible for listing in the NRHP, CRHR, or County Register pursuant to Criterion C/3.

Chester Washington Golf Course was constructed using common and utilitarian materials and does not have the potential to yield information regarding local building traditions and methods. Therefore, Chester Washington Golf Course, inclusive of the appurtenant buildings, facilities, and landscape, is not eligible for listing in the NRHP, CRHR, or County Register pursuant to Criterion D/4.

Much of Chester Washington Golf Course has not been altered since the construction of the clubhouse in 1965; only the clubhouse itself has undergone renovation. Therefore, the setting, buildings, and structures retain sufficient historic integrity and meet the criteria for listing as a historic district because of their association with the integration of Los Angeles golfing communities and with notable African-American golfers in the CRHR and County Register pursuant to Criteria 1 and 2. The period of significance is from 1954 to 1967 when the golf course was constructed and notable African-American golfers were active at the site.

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Property Name: Chester Washington Golf Course
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***D7. References:** (Continued from District Record page 1)

"Nielsen, Moffatt & Wolverton." 1970. *American Architects Directory*.

"Ted Rhodes, Charles Sifford Will Play in Golf Meet Here." 17 November 1955. *Los Angeles Sentinel*.

"Timeline of African American achievements in golf." 4 February 2011. *Professional Golfers Association*. <http://www.pga.com/timeline-African-American-achievements-in-golf>

Clark, Libby. "A 'Taste' of History- A Remembrance." 10 April 2003. *Los Angeles Sentinel*.

County of Los Angeles Department of Parks and Recreation. 30 June 1954. "Annual Report: Fiscal Year." Board of Supervisors.

Dailey, John. 27 October 1994. "Divot Diggings: Maggie's Struggle Not a Piece of Cake." *Los Angeles Sentinel*.

Dailey, John. 26 June 1986. "Washington Golf Course: Back to the Future." *Los Angeles Sentinel*.

Denney, Bob. 2 February 2015. "John Shippen Jr.: African American Pioneer; first American-born golf professional." *Professional Golfers Association*. Available at: <http://www.pga.com/news/pga/john-shippen-jr-first-African-American-golf-professional>

Hernandez, Marita. 1 September 1983. "Head of Black-Owned Newspaper Chain Dies." *Los Angeles Times*.

Jackson, Philip. 17 January 1978. "History and Prior Golf Promotion Program Designed for Western Avenue Golf Course 1974." Letter to Ray Dortch.

Lewis, Jason. 3 February 2012. "Black History Month: The First Black Golfers." *Los Angeles Sentinel*. Available at: <https://lasentinel.net/black-history-month-the-first-black-golfers.html>

Taylor, Barbara. "Charlie Sifford Gets a Los Angeles County Street Named in His Honor." August 2015. *African American Golfer's Digest*. <http://www.africanamericangolfersdigest.com/charlie-sifford-gets-a-los-angeles-county-street-named-in-his-honor/>

Wanlass, Don. 20 August 2015. "Sports Digest: Street Renamed in honor of Charlie Sifford." *Los Angeles Wave*. Available at: <http://wavenewspapers.com/sports-digest-street-renamed-in-honor-of-charlie-sifford/>

Wexler, Daniel. 9 April 2007. "History in the Making." *Los Angeles Times*. Available at: <http://www.latimes.com/sports/la-sp-history9apr09-story.html>

State of California — Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 3CD
Other Listings _____
Date:

Review Code _____ Reviewer: _____

Page 9 of 19 *Resource Name or # (Assigned by recorder): Chester Washington Golf Course
P1. Other Identifier: Chester Washington Historic District

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Inglewood Date: 1981 T30S; R14W; ___ of ___ of Sec 11; ___ B.M.

c. Address: 1818 Charlie Sifford Drive City: Los Angeles Zip: 90047

d. UTM (Give more than one for large and/or linear resources) Zone: 11, 378621.41 mE/ 3754166.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate):

Assessor's Parcel Nos.: 4057-032-901 and 4057-032-900

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): Of the 12 buildings, structures and objects located within Chester Washington Golf Course, the following 5 resources contribute to the Chester Washington Historic District: clubhouse, pro shop, bridge, comfort station No. 2, and concession stand. The following buildings and structures do not contribute to the Chester Washington Historic District: gazebo, plaque, storage shed, maintenance shed, comfort station No. 1, well house, and pump house.

*P3b. Resource Attributes (List attributes and codes): HP31 Urban Open Space

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession #):
View of pro shop, August 5, 2010

*P6. Date Constructed/Age and Source:
 Historic Prehistoric Both

*P7. Owner and Address:
County of Los Angeles
500 W. Temple Street, Room 754
Los Angeles, CA 90012

*P8. Recorded by (Name, affiliation, and address):
Alexandra Madsen
Sapphos Environmental, Inc.
430 N. Halstead Street
Pasadena, CA 91107

*P9. Date Recorded: February 14, 2017

*P10. Survey Type (Describe): Intensive, CEQA Compliance

*P11. Report Citation (Cite survey report and other sources, or enter "none"): Sapphos Environmental, Inc. 2017. Historic Evaluation for Chester Washington Golf Course.

Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

Other Listings
Review Code

Reviewer: **Date:**

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*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

P1. Other Identifier: Pro Shop

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Inglewood Date: 1981 T30S; R14W; ___ of ___ of Sec 11; ___ B.M.

c. Address: 1818 Charlie Sifford Drive City: Los Angeles Zip: 90047

d. UTM (Give more than one for large and/or linear resources) Zone: 11, 378621.41 mE/ 3754166.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate):

Assessor's Parcel Nos.: 4057-032-901 and 4057-032-900

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): The 4,270-square-foot pro shop was designed in 1956 and is situated in the north-central region of the golf course. It has an 'L'-shaped floor plan and a cross-gable roof with a projecting awning upheld by columns. Wood siding clads the exterior, and single- and double-light casement windows line the south and west facades of the building. A large concession window that opens to the pro shop's office is located in the southwest corner of the building. The pro shop was designed by County Engineer Schroeder and completed between 1957 and 1958. (See Continuation Sheet page 11)

*P3b. Resource Attributes (List attributes and codes): HP6 commercial building

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession #): View of Pro Shop, September 7, 2016

*P6. Date Constructed/Age and Source:
 Historic Prehistoric Both

*P7. Owner and Address:
County of Los Angeles
500 W. Temple Street, Room 754
Los Angeles, CA 90012

*P8. Recorded by (Name, affiliation, and address): Alexandra Madsen
Sapphos Environmental, Inc.
430 N. Halstead Street
Pasadena, CA 91107

*P9. Date Recorded: February 14, 2017

*P10. Survey Type (Describe): Intensive, CEQA Compliance

*P11. Report Citation (Cite survey report and other sources, or enter "none"): Sapphos Environmental, Inc. 2017. Historic Evaluation for Chester Washington Golf Course.

Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

CONTINUATION SHEET

Property Name: Chester Washington Golf Course
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Primary #

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Trinomial

***P3a. Description:** *(Continued from Primary Record page 10)*

Atkins previously found the pro shop ineligible for listing in the CRHR for its architecture pursuant to Criterion C/3.¹ However, the pro shop retains its integrity and has not been evaluated for listing in the NRHP or County Register or for listing in the CRHR pursuant to Criteria A/1, B/2, or D/4.

The pro shop has not undergone heavy renovations or changes and retains its integrity. The pro shop was one building that facilitated the use of the golf course for African-American players. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. The pro shop does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

¹ Harris, Brandy and Kelley Russell (Atkins). Letter to Joan Rupert (County). "CRHP Eligibility Assessment of the Chester L. Washington Golf Course Clubhouse." 13 August 2012. *Memorandum*.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code: 3CD; 5D3

Other Listings
Review Code

Reviewer: Date:

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*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

P1. Other Identifier: Bridge

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Inglewood Date: 1981 T30S; R14W; ___ of ___ of Sec 11; ___ B.M.

c. Address: 1818 Charlie Sifford Drive City: Los Angeles Zip: 90047

d. UTM (Give more than one for large and/or linear resources) Zone: 11, 378621.41 mE/ 3754166.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate):

Assessor's Parcel Nos.: 4057-032-901 and 4057-032-900

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): The original bridge located at the golf course is evident in a 1958 photograph. However, the golf course grounds underwent a major reconfiguration in 1962, and new bridges were constructed to make different regions of the golf course more accessible.¹ One of the six bridges built at this time appears to remain standing near the grove of Eucalyptus trees. This structure is located in the north-central region of the golf course. The bridge is constructed of concrete with metal railings that project outward at each edge. (See Continuation Sheet page 13)

*P3b. Resource Attributes (List attributes and codes): HP19 Bridge

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession #): View of Bridge, September 7, 2016

*P6. Date Constructed/Age and Source:
 Historic Prehistoric Both

*P7. Owner and Address:
County of Los Angeles
500 W. Temple Street, Room 754
Los Angeles, CA 90012

*P8. Recorded by (Name, affiliation, and address): Alexandra Madsen
Sapphos Environmental, Inc.
430 N. Halstead Street
Pasadena, CA 91107

*P9. Date Recorded: February 14, 2017

*P10. Survey Type (Describe): Intensive, CEQA Compliance

*P11. Report Citation (Cite survey report and other sources, or enter "none"): Sapphos Environmental, Inc. 2017. Historic Evaluation for Chester Washington Golf Course.

Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

¹ Barry and Fernana. Department of County Engineer. "Pedestrian Bridges at Western-Ave Golf Course." December 1961. Sheet No. 1. Work Order No. 8818-20.

CONTINUATION SHEET

Property Name: Chester Washington Golf Course
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***P3a. Description:** *(Continued from Primary Record page 12)*

The bridge has not undergone heavy renovations or changes and retains its integrity. The bridge is the last remaining of six structures from the 1962 landscaping of the golf course. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. The bridge does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code: 3CD; 5D3

Other Listings
Review Code

Reviewer: **Date:**

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*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

P1. Other Identifier: Comfort Station No. 2

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Inglewood Date: 1981 T30S; R14W; ___ of ___ of Sec 11; ___ B.M.

c. Address: 1818 Charlie Sifford Drive City: Los Angeles Zip: 90047

d. UTM (Give more than one for large and/or linear resources) Zone: 11, 378621.41 mE/ 3754166.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate):

Assessor's Parcel Nos.: 4057-032-901 and 4057-032-900

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): Located in the southwestern corner of the golf course, comfort station no. 2 was likely constructed in 1957 alongside the concession stand. Comfort station No. 2 measures 1,442 square feet and has a rectangular floor plan. Constructed of concrete masonry units (CMUs) the building has a raised, low-pitched gable roof with a central concrete ridge pole and exposed rafter tails. Projecting CMUs on each corner imitate quoins. Entrances flank each end of the building. H.L. Architects likely designed the comfort station. (See Continuation Sheet page 15)

*P3b. Resource Attributes (List attributes and codes): HP4 ancillary building

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession #): View of Comfort Station No. 2, September 7, 2016

*P6. Date Constructed/Age and Source:
 Historic Prehistoric Both

*P7. Owner and Address:
County of Los Angeles
500 W. Temple Street, Room 754
Los Angeles, CA 90012

*P8. Recorded by (Name, affiliation, and address): Alexandra Madsen
Sapphos Environmental, Inc.
430 N. Halstead Street
Pasadena, CA 91107

*P9. Date Recorded: February 14, 2017

*P10. Survey Type (Describe): Intensive, CEQA Compliance

*P11. Report Citation (Cite survey report and other sources, or enter "none"): Sapphos Environmental, Inc. 2017. Historic Evaluation for Chester Washington Golf Course.

Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

CONTINUATION SHEET

Property Name: Chester Washington Golf Course
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Trinomial

***P3a. Description:** *(Continued from Primary Record page 14)*

Comfort station No. 2 has not undergone heavy renovations or changes and retains its integrity. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. Comfort station No. 2 does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code: 3CD; 5D3

Other Listings
Review Code

Reviewer: **Date:**

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*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

P1. Other Identifier: Concession Stand

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Inglewood Date: 1981 T30S; R14W; ___ of ___ of Sec 11; ___ B.M.

c. Address: 1818 Charlie Sifford Drive City: Los Angeles Zip: 90047

d. UTM (Give more than one for large and/or linear resources) Zone: 11, 378621.41 mE/ 3754166.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate):

Assessor's Parcel Nos.: 4057-032-901 and 4057-032-900

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): The Mid-Century Modern-style concession stand was designed and constructed in 1957 of CMUs. With a square footprint, the concession stand's complex shape is created from its slightly slanted flat asymmetrical roof situated to project over each secondary façade of the building, rather than the typical corners. Exposed ridge poles hold the roof and accentuate the building's abstracted form. Projecting metal sheaves create counters below concession windows. The concession stand was constructed by H.L. Architects. (See Continuation Sheet page 17)

*P3b. Resource Attributes (List attributes and codes): HP6 commercial building

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession #): View of Concession Stand, September 7, 2016

*P6. Date Constructed/Age and Source:
 Historic Prehistoric Both

*P7. Owner and Address:
County of Los Angeles
500 W. Temple Street, Room 754
Los Angeles, CA 90012

*P8. Recorded by (Name, affiliation, and address): Alexandra Madsen
Sapphos Environmental, Inc.
430 N. Halstead Street
Pasadena, CA 91107

*P9. Date Recorded: February 14, 2017

*P10. Survey Type (Describe): Intensive, CEQA Compliance

*P11. Report Citation (Cite survey report and other sources, or enter "none"): Sapphos Environmental, Inc. 2017. Historic Evaluation for Chester Washington Golf Course.

Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

CONTINUATION SHEET

Property Name: Chester Washington Golf Course
Page 17 of 19

Primary #

HRI #

Trinomial

***P3a. Description:** *(Continued from Primary Record page 16)*

The concession stand has not undergone heavy renovations or changes and retains its integrity. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African American golfers Charles Sifford, Maggie Hathaway, and Ted Rhodes among others. The concession stand does not convey this significance as an individual resource sufficiently to merit listing in the NRHP, CRHR, or County Register pursuant to any criteria.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code: 3CD; 5D3

Other Listings
Review Code

Reviewer: **Date:**

Page 18 of 19

*Resource Name or # (Assigned by recorder): Chester Washington Golf Course

P1. Other Identifier: Clubhouse

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Inglewood Date: 1981 T30S; R14W; ___ of ___ of Sec 11; ___ B.M.

c. Address: 1818 Charlie Sifford Drive City: Los Angeles Zip: 90047

d. UTM (Give more than one for large and/or linear resources) Zone: 11, 378621.41 mE/ 3754166.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate):

Assessor's Parcel Nos.: 4057-032-901 and 4057-032-900

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): Designed in 1962 and built in 1965, the 16,669-square-foot clubhouse is a Mid-Century Modern-style building. The clubhouse was designed by Los Angeles-based architects Nielsen, Moffatt & Wolverton in 1962, and built by LA-KE Construction Company in 1965. The clubhouse has a complex, horseshoe-shaped floor plan, flat roof, and stuccoed exterior. A projecting concrete porte-cochere provides a symmetrical compliment to the otherwise low and unassuming façade. This entrance, originally a lighter color and adorned in selected locations with turquoise tiles, has been heavily altered in the past few years, and is missing much of its original historic fabric. Additionally, rough-hewn stone veneer was added to the median and entrance surround during this alteration. (See Continuation Sheet page 19)

*P3b. Resource Attributes (List attributes and codes): HP6 commercial building

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession #): View of Clubhouse, September 7, 2016

*P6. Date Constructed/Age and Source:
 Historic Prehistoric Both

*P7. Owner and Address:
County of Los Angeles
500 W. Temple Street, Room 754
Los Angeles, CA 90012

*P8. Recorded by (Name, affiliation, and address): Alexandra Madsen
Sapphos Environmental, Inc.
430 N. Halstead Street
Pasadena, CA 91107

*P9. Date Recorded: February 14, 2017

*P10. Survey Type (Describe): Intensive, CEQA Compliance

*P11. Report Citation (Cite survey report and other sources, or enter "none"): Sapphos Environmental, Inc. 2017. Historic Evaluation for Chester Washington Golf Course.

Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

CONTINUATION SHEET

Property Name: Chester Washington Golf Course

Page 19 of 19

***P3a. Description:** (Continued from Primary Record page 18)

The southeastern façade is concave and curved with large, floor-to-ceiling windows. A deep, projecting overhang accentuates the curvilinear form of the building. Turquoise tile was removed in the 2012/2013 renovation. Atkins previously found the clubhouse ineligible for listing in the CRHR for its architecture pursuant to Criterion 3.¹ The clubhouse lost some of its integrity after a 2012/2013 renovation, in which some of the entrance's original historic fabric was removed. However, removal of the historic tile, paint, and added rock veneer alterations are reversible which is in keeping with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. Moreover, although the building has lost some integrity, it retains sufficient integrity with its general form and historic fabric to convey significance and reflect its history of hosting notable events and people. Therefore, it contributes to a potential historic district and is eligible for listing in the CRHR and County Register pursuant to Criteria 1 and 2 for its connection with the integration of golf courses in Los Angeles and association with notable African-American golfers Charlie Sifford, Maggie Hathaway, and Ted Rhodes among others. The pro shop as an individual resource does not sufficiently convey an association with significant events and persons to rise to the threshold for listing in the NRHP, CRHR, or County Register pursuant to any criteria.

¹ Harris, Brandy and Kelley Russell (Atkins). Letter to Joan Rupert (County). "CRHP Eligibility Assessment of the Chester L. Washington Golf Course Clubhouse." 13 August 2012. *Memorandum*.

APPENDIX F

NATIONAL PARK SERVICE PRESERVATION BRIEFS*

*Appendix F, *National Park Service Preservation Briefs* has been provided to the County of Los Angeles as a separate .ZIP file.



CUSTOMERS FIRST

Eric Garcetti, Mayor
Board of Commissioners
Mel Levine, President
William W. Funderburk Jr., Vice President
Jill Banks Barad
Christina E. Noonan
Aura Vasquez
Barbara E. Moschos, Secretary
David H. Wright, General Manager

June 25, 2018

Zita Yu, Ph.D., P.E.
West Basin Municipal Water District
17140 South Avalon Boulevard, Suite 210
Carson, CA 90745

Dear Dr Yu:

Subject: Comment Letter Regarding the Draft Environmental Impact Report for the Ocean Water Desalination Project

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for Ocean Water Desalination Project. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the DEIR, the LADWP has determined that the project may have impacts to power resources and respectfully submits the comment below.

LADWP-1

Comment:

Figure 3-21 identifies Scattergood Generating Station as a potential laydown and parking area for the project. The LADWP does not have any space available at the Scattergood Generating Station and requests that this facility be removed from consideration as an off-site potential construction staging/laydown area.

LADWP-2

For any questions regarding the above comments, please contact Mr. Brian Gonzalez of my staff at (213) 367-2612 or at brian.gonzalez@ladwp.com.

LADWP-3

Sincerely,

Charles C. Holloway (handwritten signature)

Charles C. Holloway
Manager of Environmental Planning and Assessment

BG:ns
c: Brian Gonzalez

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

BOARD OF PUBLIC WORKS
MEMBERS

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MAS DOJIRI
ASSISTANT DIRECTORS

TIMEYIN DAFETA
HYPERION EXECUTIVE PLANT MANAGER

WASTEWATER ENGINEERING SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

April 9, 2018

Zita Yu, Ph.D, P.E., Project Manager
West Basin Municipal Water District
Outside Company Department if Applicable
17140 South Avalon Boulevard
Carson, CA, 90746

Dear Ms. Yu,

OCEAN WATER DESALINATION PROJECT (SCH # 2015081087) – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

This is in response to your March 28, 2018 letter requesting a review of your proposed ocean water desalination facility located at 301 Vista Del Mar, El Segundo, CA. LA Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be in the Notice of Availability of a Draft Environmental Impact Report phase.

LASAN-1

Based on the project location, we have determined the sewer infrastructure does not fall in the jurisdiction of the City of Los Angeles, and therefore do not offer further analysis. Should the project location change, please continue to send us information so we may determine if a sewer assessment is required in the future.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

LASAN-2

Sincerely,

Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

CD/AP:al

c: Kosta Kaporis, LASAN
Christopher DeMonbrun, LASAN

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\Ocean Water Desalination Project - NOA of dEIR.docx

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

June 25, 2018

VIA EMAIL AND UPS

Ms. Zita Yu
West Basin Municipal Water District
17140 S. Avalon Blvd., Suite 210
Carson, CA 90746

Dear Ms. Yu:

West Basin Ocean Water Desalination Project
California Environmental Quality Act (CEQA)
Draft Environmental Impact Report (DEIR), SCH #2015081087

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (DEIR) for the West Basin Municipal Water District's (West Basin) proposed West Basin Ocean Water Desalination Project (Proposed Project). The Proposed Project would construct a desalination facility to produce municipal drinking water from ocean water for distribution to West Basin's customers through either the installation of a new conveyance system or connection to Metropolitan's existing distribution system.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, including West Basin, serving approximately 19 million people in portions of six counties in Southern California, including Los Angeles County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Construction of the full build-out of the Proposed Project would consist of the desalination facility, screened ocean intake, concentrate discharge system, and conveyance system to distribute the desalinated water to West Basin's Member Agencies and a connection to Metropolitan's existing distribution pipeline system. The Proposed Project would be built in two phases, with the initial or Local Project being designed to produce 20 million gallons per day (mgd) of potable water supply (Local Project) followed by a potential expansion to a larger project, which would produce up to 60 mgd (Regional Project). The DEIR analyzes the Local Project at the project level and the Regional Project at a program level as details concerning its design and operational characteristics are not yet determined and cannot be analyzed at this time at the level of detail required for a project-level analysis. West Basin staff have indicated that water produced by the Local Project would only integrate into West Basin's new water system



MWD-1

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Ms. Yu
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and water produced by the Regional Project would integrate directly into Metropolitan's distribution system.

In partnership with local water agencies, Metropolitan is a statewide leader in implementing water conservation programs and developing progressive water resources such as wastewater recycling and groundwater recovery. Metropolitan alone has invested nearly \$1.4 billion in these programs and resources, and our member agencies, including West Basin together have invested many more. Recent Metropolitan accomplishments include funding the replacement of almost 150 million square feet of turf with water-efficient landscapes, nearly tripling the Governor's drought response goal of 50 million square feet for all of California.

The severity of the State's recent drought, the extended dry period on the Colorado River, and the projected long-term impacts of climate change underscore the need for continued diversification of Southern California's water resource portfolio. Metropolitan's long-term Integrated Water Resources Plan (IRP) achieves diversification with an "all of the above" approach. This includes maintaining Colorado River Aqueduct supplies and restoring the reliability of the State Water Project, while also developing local climate-resilient supplies such as seawater desalination. The IRP established a regional goal of 2.4 million acre-feet in annual production from local supplies by the year 2040, a significant increase above production levels seen in recent years, which have been closer to 1.8 million acre-feet. Over the same time horizon, local planning agencies project Metropolitan's service area to grow by more than three million people. New projects such as the Proposed Project would help increase local supplies and reduce Southern California's reliance on imported water supplies to meet expected future demands.

In 2006, Metropolitan entered into a Seawater Desalination Program (SDP) agreement with West Basin to support the development of the Local Project component of the Proposed Project. Under the terms of the agreement, once all precedent conditions were met, including completion of environmental documentation and approval by Metropolitan's Board, Metropolitan would pay West Basin approximately \$250 per acre-foot of municipal drinking water produced by the Proposed Project up to a maximum of 20,000 acre-feet per year. Metropolitan's technical assistance to West Basin included evaluating system distribution integration and water quality challenges as part of West Basin's Program Master Document completed in 2011.

Full details on the Regional Project's design and operational characteristics have not been determined at this time. Metropolitan will need to continue to work with West Basin during design of the Regional Project to address a number of significant engineering challenges that could arise should West Basin desire to connect and integrate into one or several of our local conveyance pipelines, including: available system capacity; winter demand levels; blending and



MWD-1

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

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corrosion effects to our pipelines; increased turbidity or changes in bromide, temperature, alkalinity, hardness, pH, chloride-to-sulfate mass ratios, and corrosion indices; effects on system hydraulics; effects on existing operations such as possible reversal of existing flow and impacts to water deliveries and existing water treatment plant operations; effects on existing water quality metrics; and effects on system reliability and redundancy. Metropolitan does not have a policy enabling the integration of local supplies into its distribution system. Metropolitan staff would need to seek Board approval for any actions requesting integration into our system.

Additionally, Metropolitan owns and operates a number of large diameter pipelines within and adjacent to the West Basin service area (see Figure 3-5 in the DEIR). As depicted on the Figure, several of the Proposed Project's new conveyances may be located adjacent to Metropolitan's pipelines. To avoid potential conflicts with these and other Metropolitan facilities, Metropolitan requests that West Basin coordinate with Metropolitan's Substructures Team. Detailed prints of drawings of Metropolitan's pipelines, facilities, and rights-of-way may be obtained by calling the Substructures Team at (213) 217-6564. To assist West Basin in preparing plans which are compatible with Metropolitan's facilities and rights-of-way, a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California" is enclosed.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Mr. Tom Napoli at (213) 217-6720.

Very truly yours,



for

Deirdre Brand
Section Manager, Environmental Planning

TN:tn

SharePoint/West Basin Ocean Water Desalination Project DEIR – SCH #2015081087

- Enclosures: (1) Planning Guidelines
(2) Map of Metropolitan Facilities in Project Vicinity



MWD-1

Guidelines for Developments in the
Area of Facilities, Fee Properties, and/or Easements
of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-foot-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

- 3 -

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

- 4 -

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

- 5 -

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alignment as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

- 6 -

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of-way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

- 7 -

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assist others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

- 8 -

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must be restricted to that which

- 11 -

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

- 12 -

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

- 13 -

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

- 14 -

17. Additional Information

Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

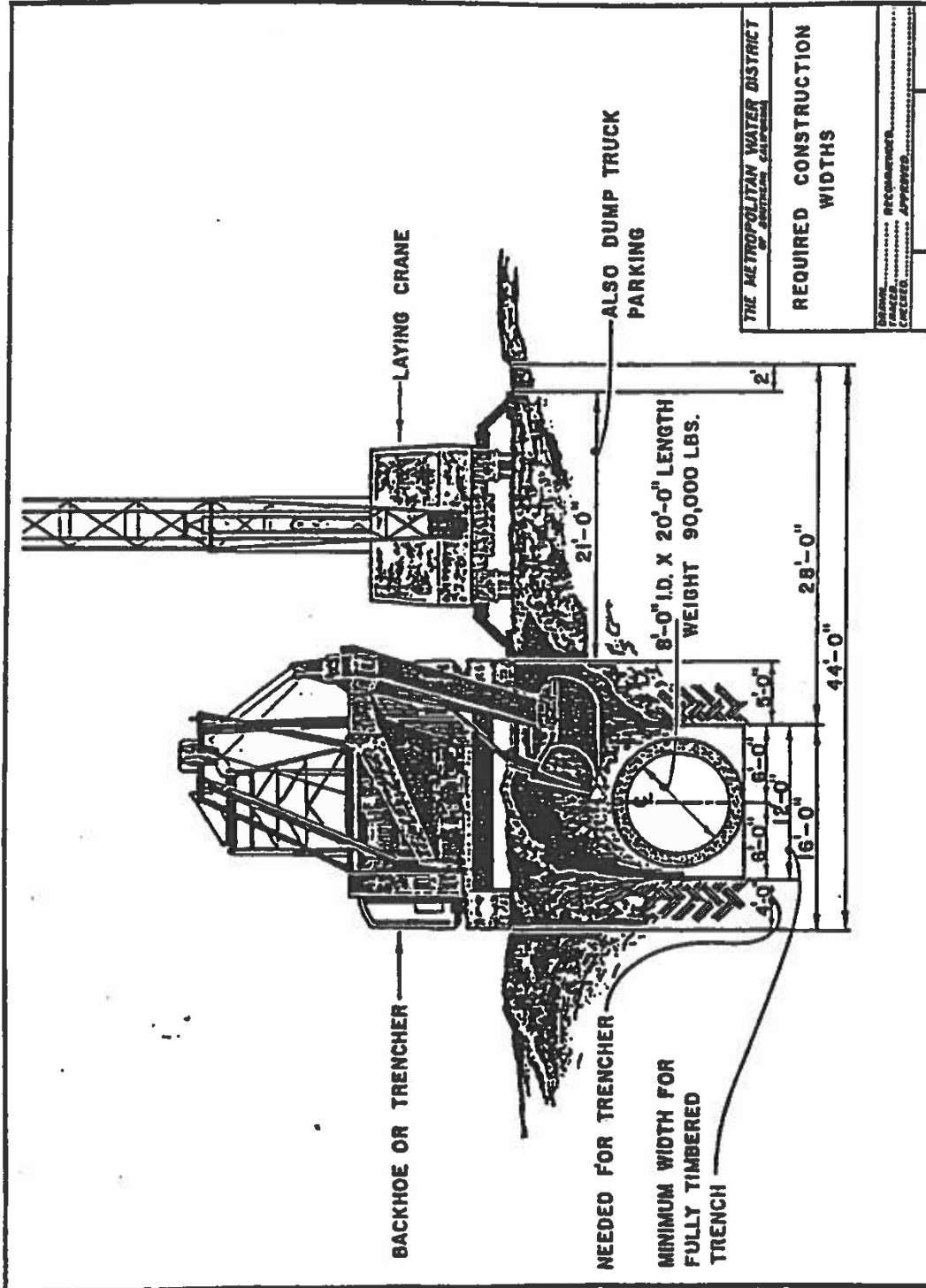
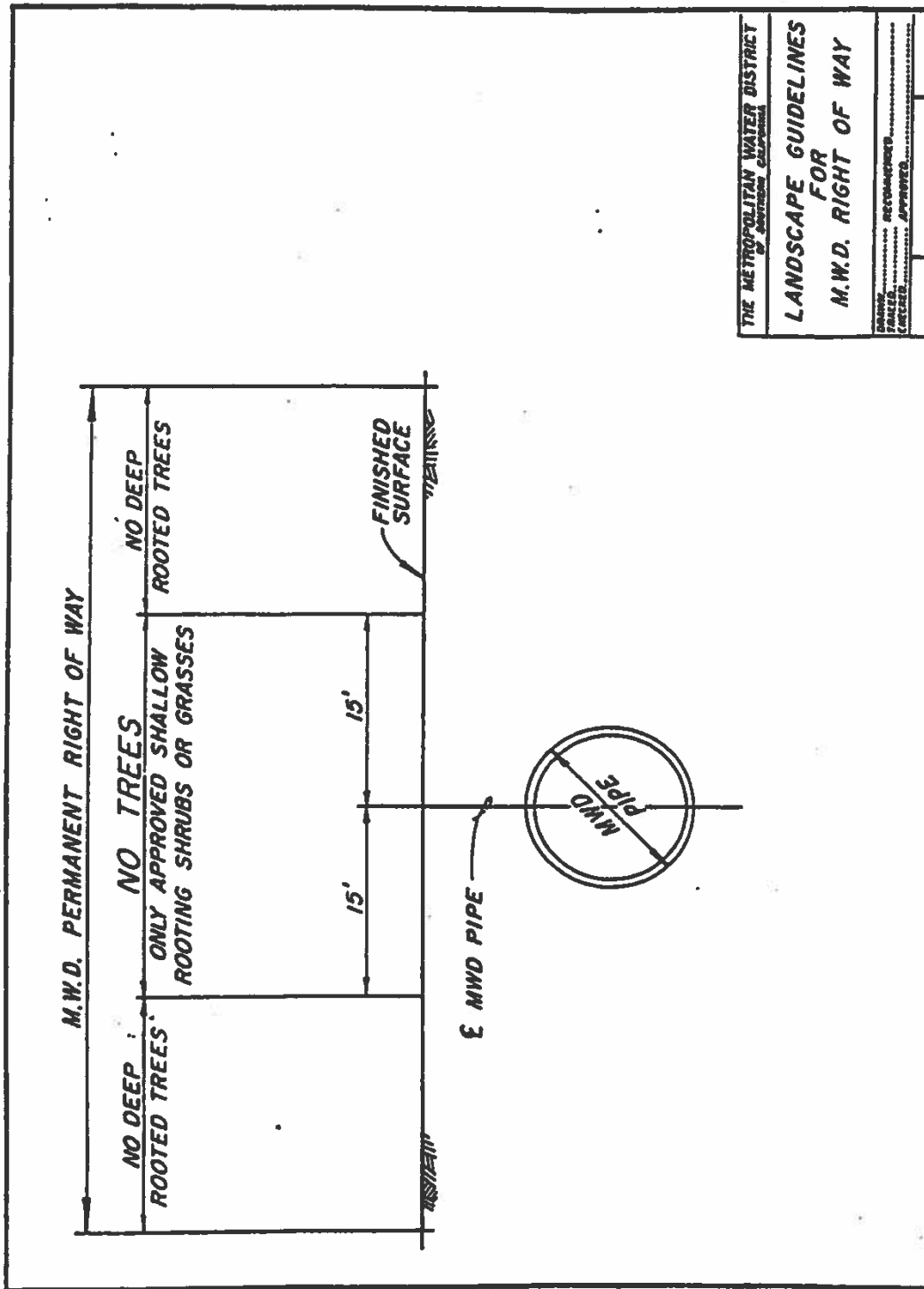


FIGURE 1

FROM MD 30 S 1500 11-88 P.A. 105, 60 0007

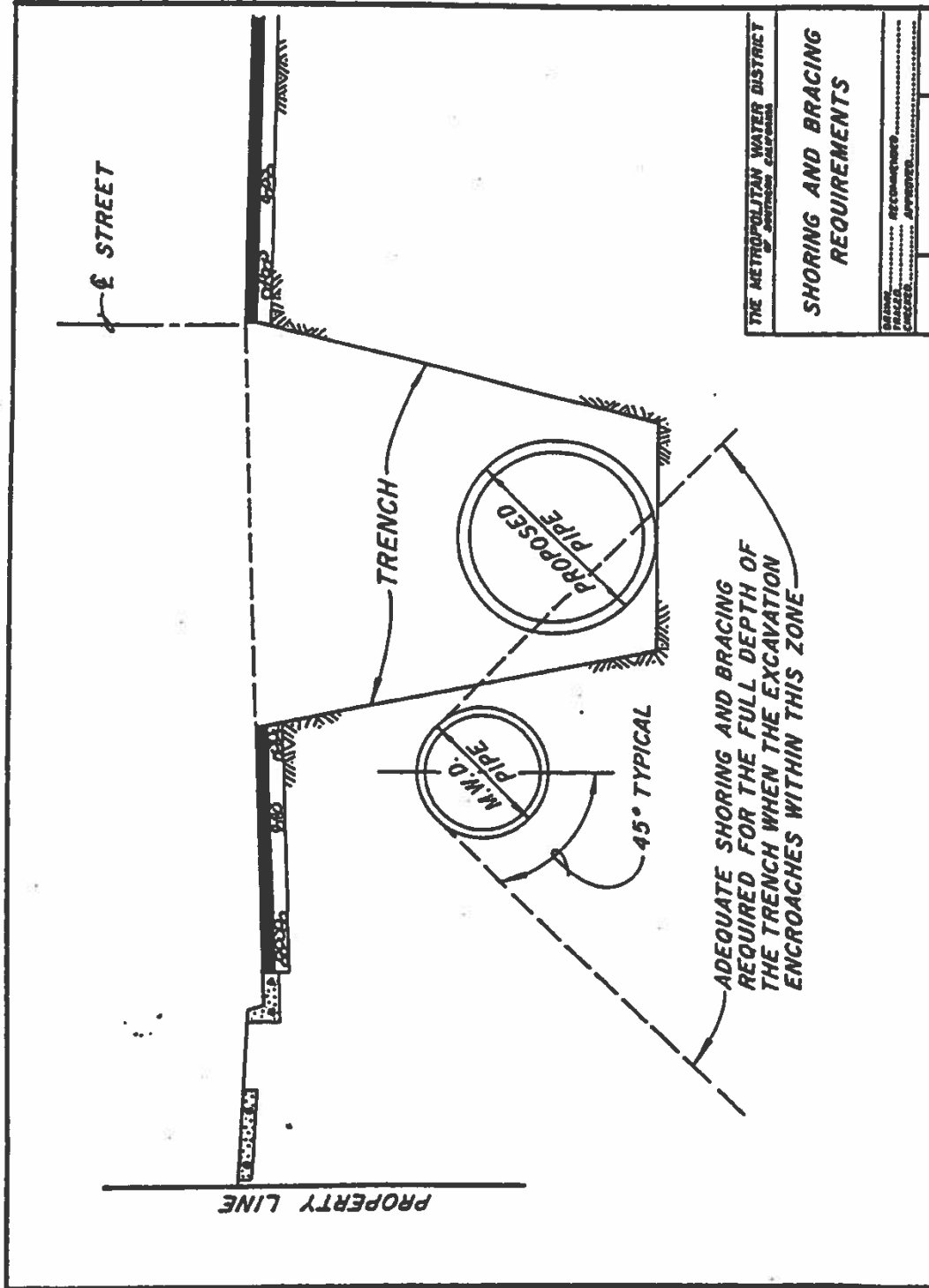


THE METROPOLITAN WATER DISTRICT
OF ANTIPOLO, CALAPUZA

**LANDSCAPE GUIDELINES
FOR
M.W.D. RIGHT OF WAY**

DESIGNED BY.....
DRAWN BY.....
CHECKED BY.....
APPROVED BY.....

FIGURE 3



THE METROPOLITAN WATER DISTRICT
of Southern California

**SHORING AND BRACING
REQUIREMENTS**

DESIGNED BY: _____
CHECKED BY: _____
DATE: _____

FIGURE 4

FORM NO. 95-9 (REV. 11-88) P. 2 OF 25 (REV. 11-88)

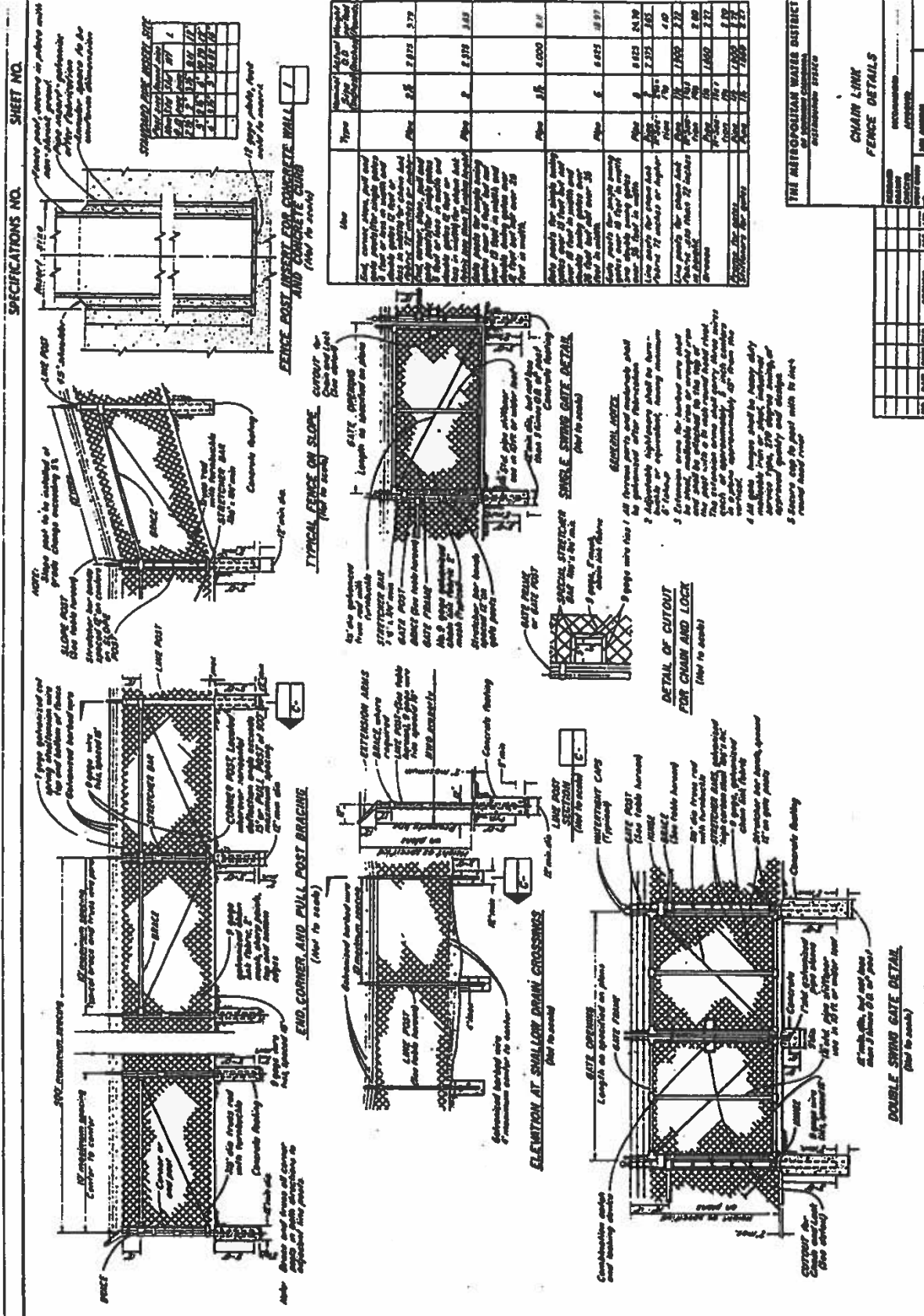
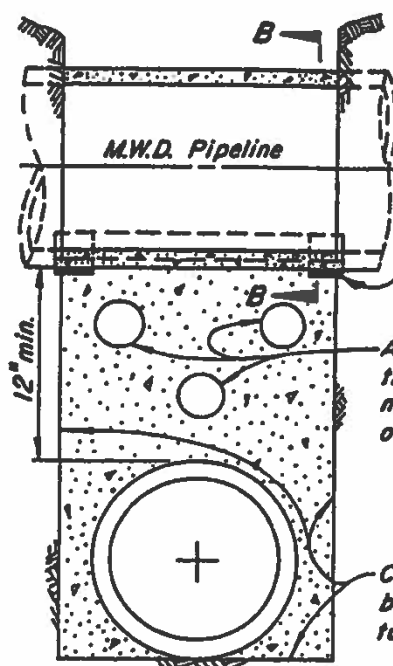


FIGURE 5

DRAWN BY: 00-3 6000 11-13 P.O. 41-2110

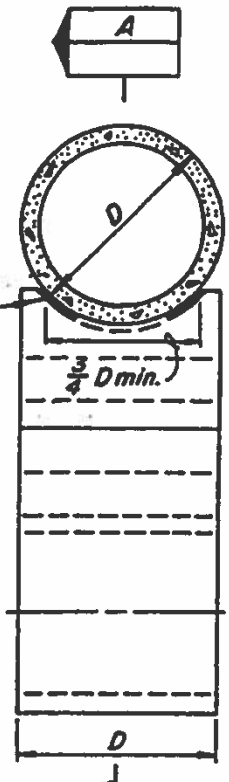


SECTION "A-A"

$\frac{3}{4}$ " x 6" premolded expansion joint filler

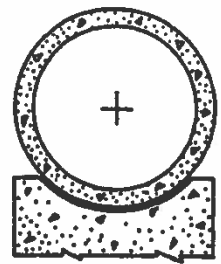
Apertures as directed by the Engineer, total volume not to exceed $\frac{1}{2}$ the volume of the supporting wall

Concrete support wall to be placed against undisturbed ground



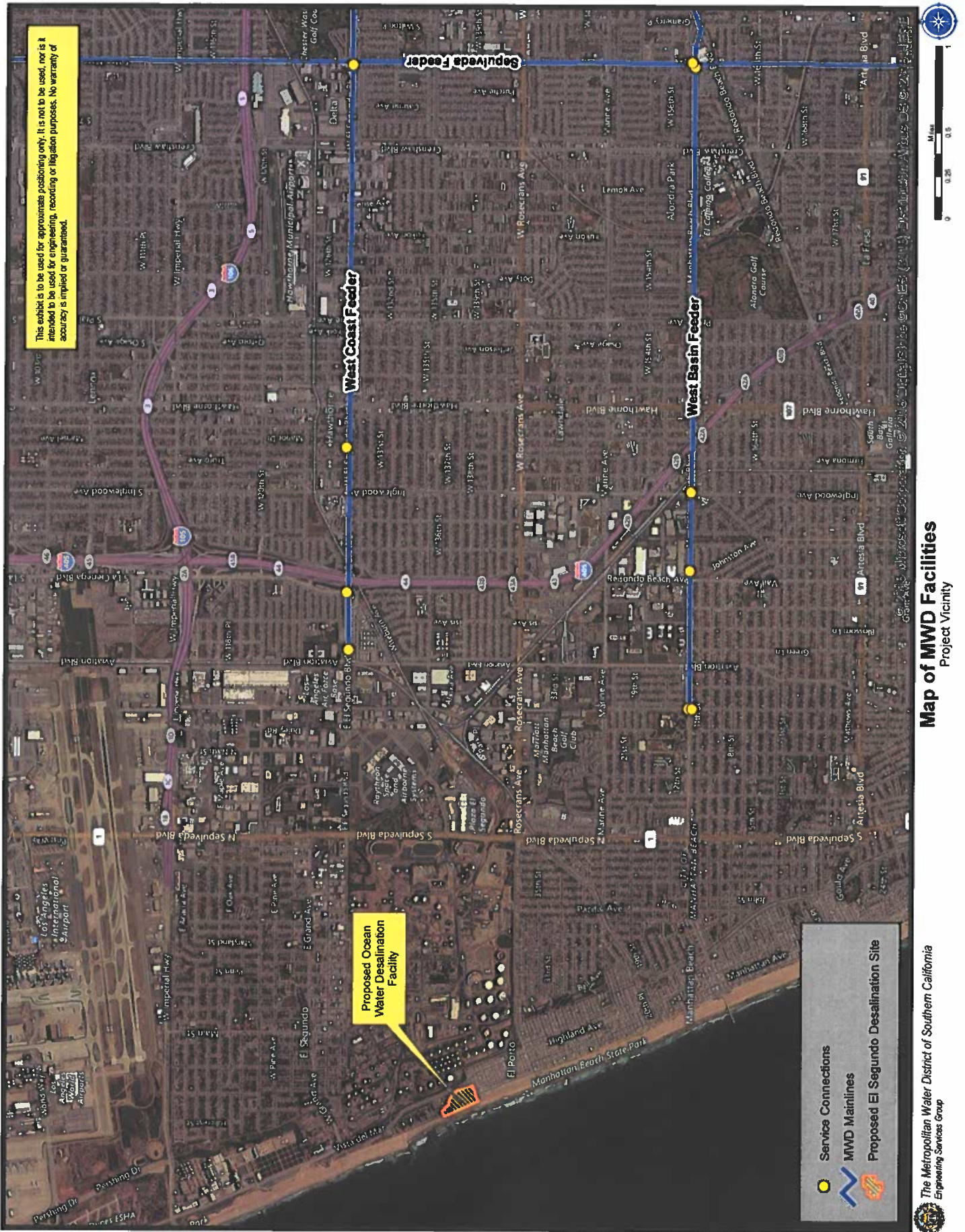
CROSS SECTION

1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



SECTION "B-B"

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA	
TYPICAL SUPPORT FOR M.W.D. PIPELINE	
DRAWN	RECOMMENDED
TRACED	APPROVED
CHECKED	
C-9547	



Vertical: West, Basin, Desalination, Purified, Reservoir, Project, Facility, Position, Printed 02/22/2018 | Photography Date: Bing | Prepared by: Tom Blodner (Geodesics & Mapping Team) | Checked by: Tom Nagel | Job: GIS 18-05-32

SENT VIA E-MAIL AND USPS:

May 15, 2018

desalEIR@westbasin.org

Zita Yu, Ph.D., P.E., Project Manager
West Basin Municipal Water District
17140 South Avalon Boulevard
Carson, CA 90746

**Draft Environmental Impact Report (Draft EIR) for the Proposed
West Basin Ocean Water Desalination Project Building (SCH No.: 2015081087)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQ-1

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct an ocean water desalination facility with a range of 20 to 60 million gallons per day of potable drinking water (Proposed Project). The Proposed Project would also include construction of ocean water intake and concentrate (brine) discharge infrastructure and a desalinated water conveyance system. Construction of the Proposed Project is expected to take approximately 72 months¹.

SCAQ-2

General Conformity Review and Determination

The Lead Agency included a discussion the General Conformity review and analysis in the Draft EIR. The conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a national ambient air quality standard (NAAQS); (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM2.5. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NOx general conformity budgets were established in the Final 2012 AQMP: 1 tons per day (tpd) of NOx and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030. SCAQMD has set up a tracking system for projects requiring conformity determinations on a first come first serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted.

SCAQ-3

Should the Lead Agency have any questions related to the SCAQMD General Conformity review process and determination, they can be directed to Ms. Sang-Mi Lee, Program Supervisor, at slee@aqmd.gov.

SCAQMD Permits

Statewide Portable Equipment Registration is required for certain portable equipment used onsite for less than one year, and SCAQMD permit is required if onsite portable equipment is used for one year or more (California Health and Safety Code Section 41755). In the event that development of the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. Any assumptions used in the air quality analysis in the Final EIR

SCAQ-4

¹ Draft EIR. Page 3-18.

Comment Letter SCAQMD

will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

↑
SCAQ-4

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

↑
SCAQ-5

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

↑
SCAQ-6

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC180327-10

Control Number

Comment Letter SOCALGAS

From: SoCalGasTransmissionUtilityRequest
<SoCalGasTransmissionUtilityRequest@semprautilities.com>
Sent: Thursday, April 19, 2018 2:32 PM
To: West Basin Desal EIR
Subject: 0571-18-1170,1172,1173,1175,1241
Attachments: 0571-18-1170,1172,1173,1175,1241.pdf; ELS 20.pdf; ELS 6.pdf; ELS 9.pdf; ELS 10.pdf; ELS 11.pdf; ELS 12.pdf; ELS 13.pdf; ELS 14.pdf; ELS 15.pdf; OWDP-NOA.PDF

To Zita Yu,

Attached are copies of the requested atlas maps. Also included is a letter stating that we have high pressure gas transmission lines within your proposed project vicinity.

When contacting us regarding this project, please reference the assigned PF# 0571-18-1170,1172,1173,1175,1241

SCG-1
↓

Thank you,

Luis Ramirez
Pipeline Planning Assistant
SOCALGASTRANSMISSIONUTILITYREQUEST@SEMPRAUTILITIES.COM



TO HELP THE ENVIRONMENT AND TO EXPEDITE RESPONSES, PLEASE SEND FUTURE PROJECTS AND CORRESPONDING ATTACHMENTS VIA EMAIL:
SoCalGasTransmissionUtilityRequest@semprautilities.com



A Sempra Energy utility

Luis Ramirez
Pipeline Planning Assistant

9400 Oakdale Ave
Chatsworth, CA 91311

LRamirez5@semprautilities.com

April 19, 2018

West Basin Municipal Water District
17140 South Avalon Boulevard
Carson, CA 90746

Email: Zita Yu - desalEIR@westbasin.org

Subject: Ocean Water Desalination Project (SCH # 2015081087)
Lead Agency: West Basin Municipal Water District
Project Location: 301 Vista Del Mar, El Segundo, CA and the surrounding cities of El Segundo, Los Angeles, Manhattan Beach, Hawthorne, Redondo Beach, Gardena, Torrance, Hermosa Beach, and portions of unincorporated Los Angeles County

DCF: 0571-18-1170,1172,1173,1175,1241

Southern California Gas Company (SoCalGas), Gas Transmission Department, operates and maintains high-pressure natural gas transmission pipeline **1170, 1172, 1173, 1175, 1241** in the vicinity of your project. The pipeline is shown on the attached atlas prints. Please note: only the high-pressure transmission pipeline information is current on these atlas prints.

Our Gas Distribution Department may have other gas facilities within your project area. To assure no conflict with the SoCalGas' distribution pipeline system, please e-mail them at NorthwestDistributionUtilityRequest@semprautilities.com.

This is only a response to a gas facility map request; a review of potential conflicts associated with your request has not been conducted. Consequently, **this letter does not constitute clearance for any construction work near or around SoCalGas' pipeline(s)**. As your project plans are developed, you must notify SoCalGas - Gas Transmission Department regarding the improvements that are proposed near our pipeline(s) and within our easement(s) before you begin any construction, including potholing. In doing so, please allow sufficient time as there may be certain requirements that need to be incorporated into your project's design and could significantly affect your project construction schedule.

↑
SCG-1

Sincerely,

Luis Ramirez
Pipeline Planning Assistant
LRamirez5@semprautilities.com
(818) 701-4546

April 19, 2018

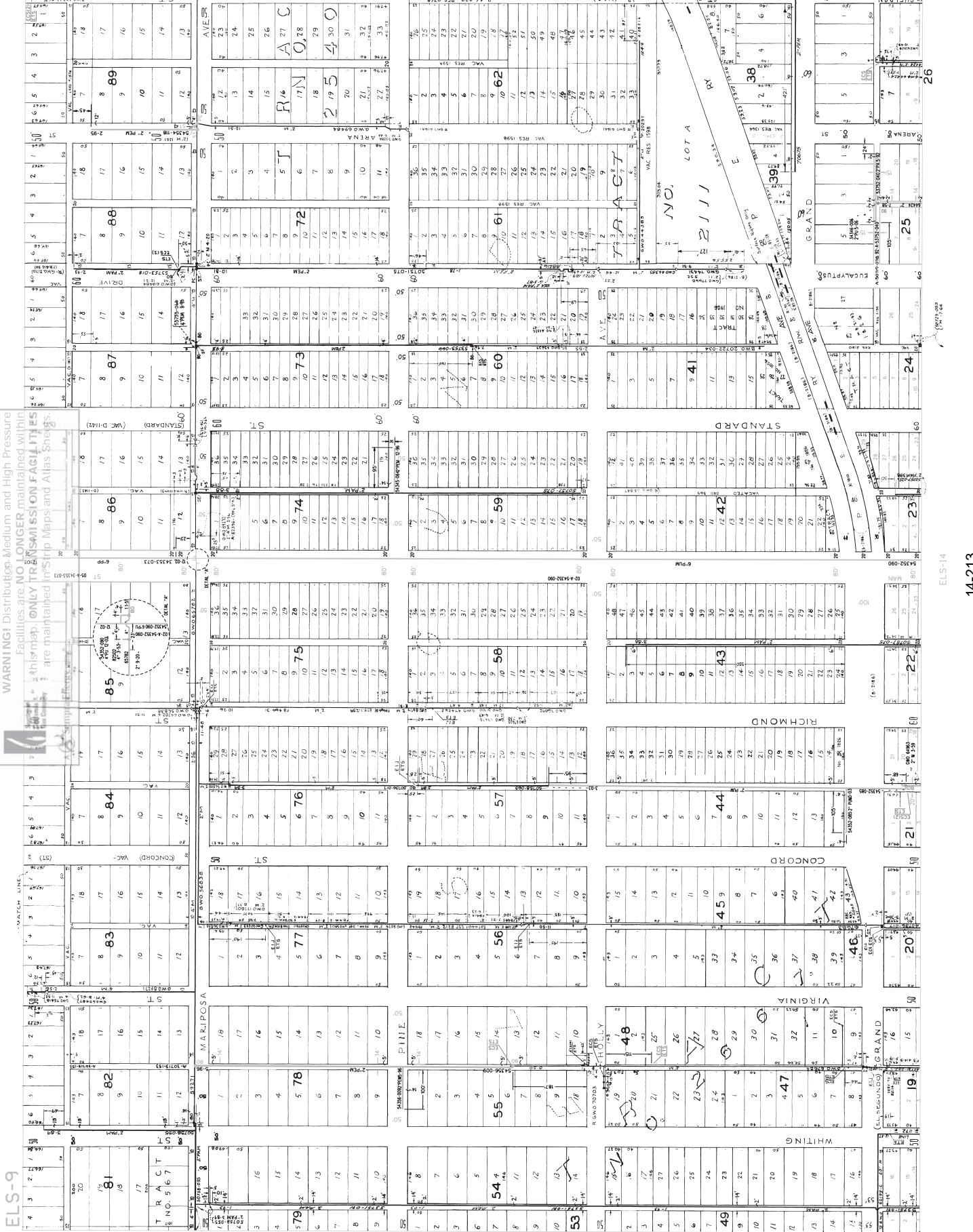
Comment Letter SOCALGAS

WARNING! Distribution Medium and High Pressure facilities are **NO LONGER** maintained within this map. **ONLY TRANSMISSION FACILITIES** are maintained in Strip Maps and Atlas Sheets.

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RANGE 22E
227-989



ELS-14

14-213

ELS 9

ELS-20

ELS-21

ELS-22

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Comment Letter SOCALGAS

WARNING! Distribution Medium and High Pressure Facilities are **NO LONGER** maintained within this map. **ONLY TRANSMISSION FACILITIES** are maintained in Strip Maps and Atlas Sheets.



A Sempra Energy utility



201-999

TRACT

PACIFIC OCEAN

ELS 10

ELS 15

ELS 10



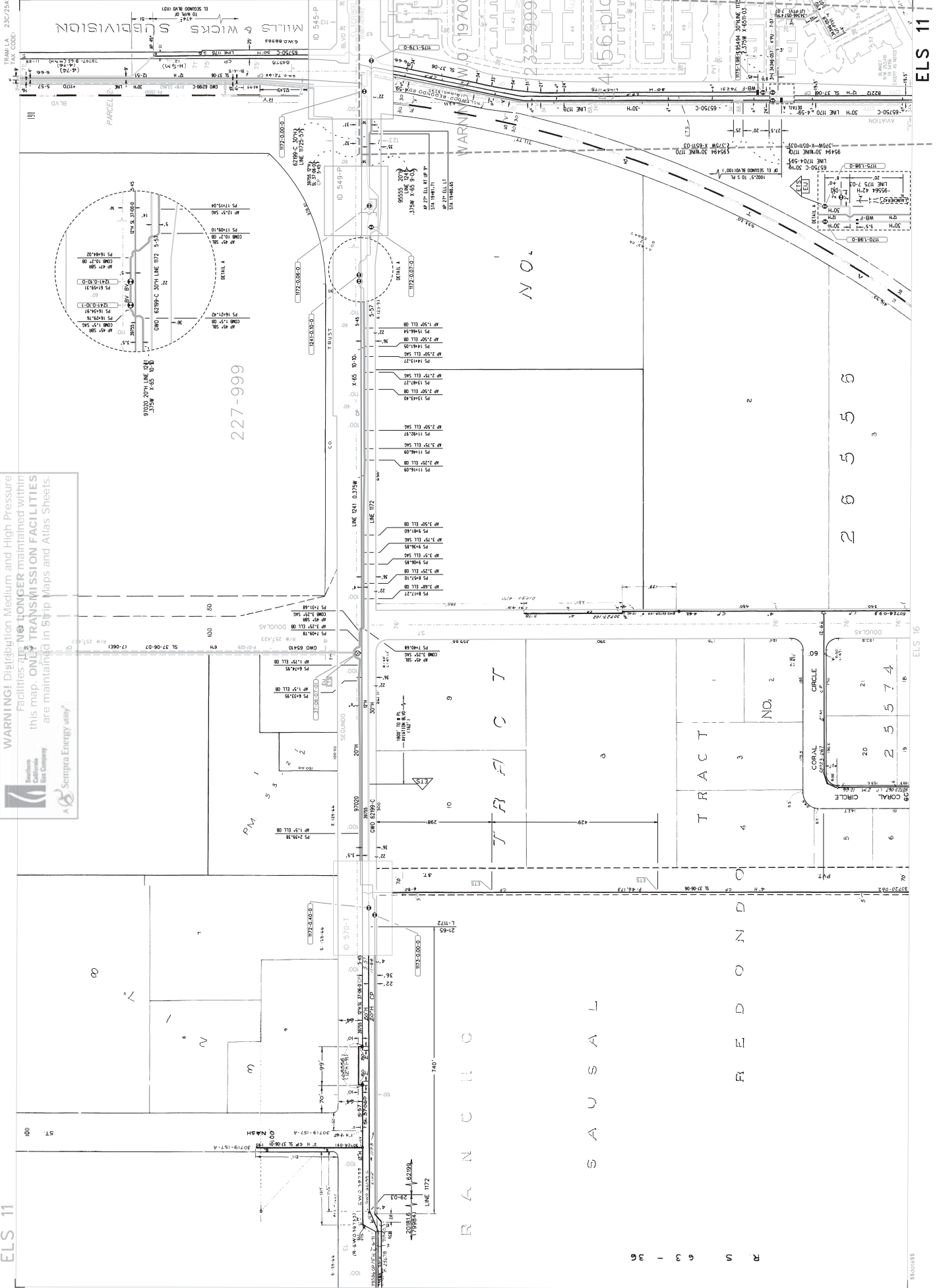
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Comment Letter SOCALGAS

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A Sempra Energy utility



Comment Letter SOCALGAS

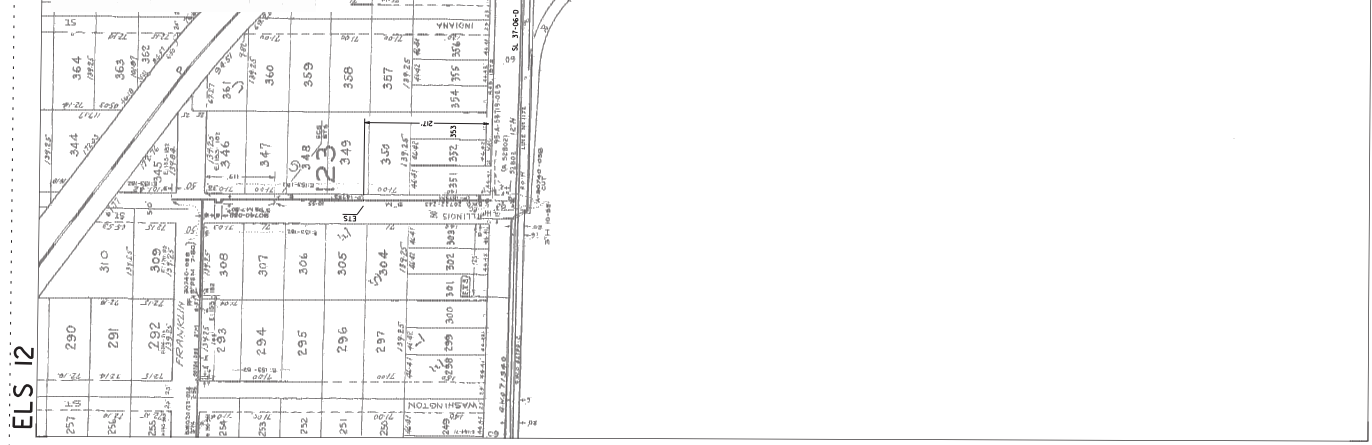
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SOUTHERN PACIFIC

WARNING! Distribution Medium and High Pressure Facilities are **NO LONGER** maintained within this map. **ONLY TRANSMISSION FACILITIES** are maintained in Strip Maps and Atlas Sheets.



A Sempra Energy utility



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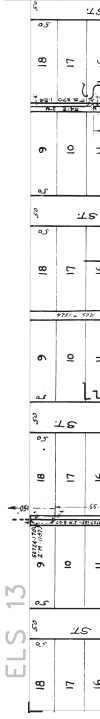
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Comment Letter SOCALGAS

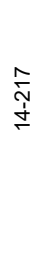
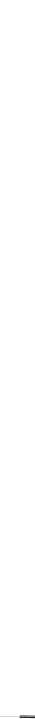
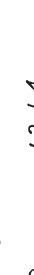
WARNING! Distribution Medium and High Pressure facilities are **NOT** to be maintained with this map. **ONLY** TRANSMISSION FACILITIES are to be maintained in Strip Maps and Atlas Sheets.



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LOT 3.
TRACT NO 1314
M.B. 20 - 161



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WARNING! Distribution Medium and High Pressure Facilities are NO LONGER maintained within this map. ONLY TRANSMISSION FACILITIES are maintained in Strip Maps and Atlas Sheets.



Socal Gas Company
Socal Gas Company
Socal Gas Company

ELS 15

201-999

227-999

T R A C T

NO.

LOT 2

J 3 1 4

PACIFIC OCEAN

TIDE LINE

HIGH



ELS 20

14-219

ELS 15

TRAW 23-259
TAX CODE

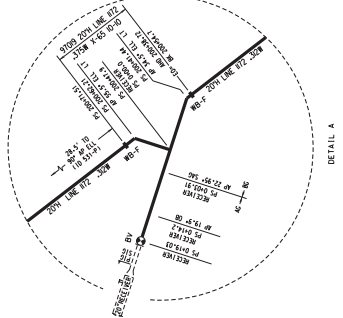
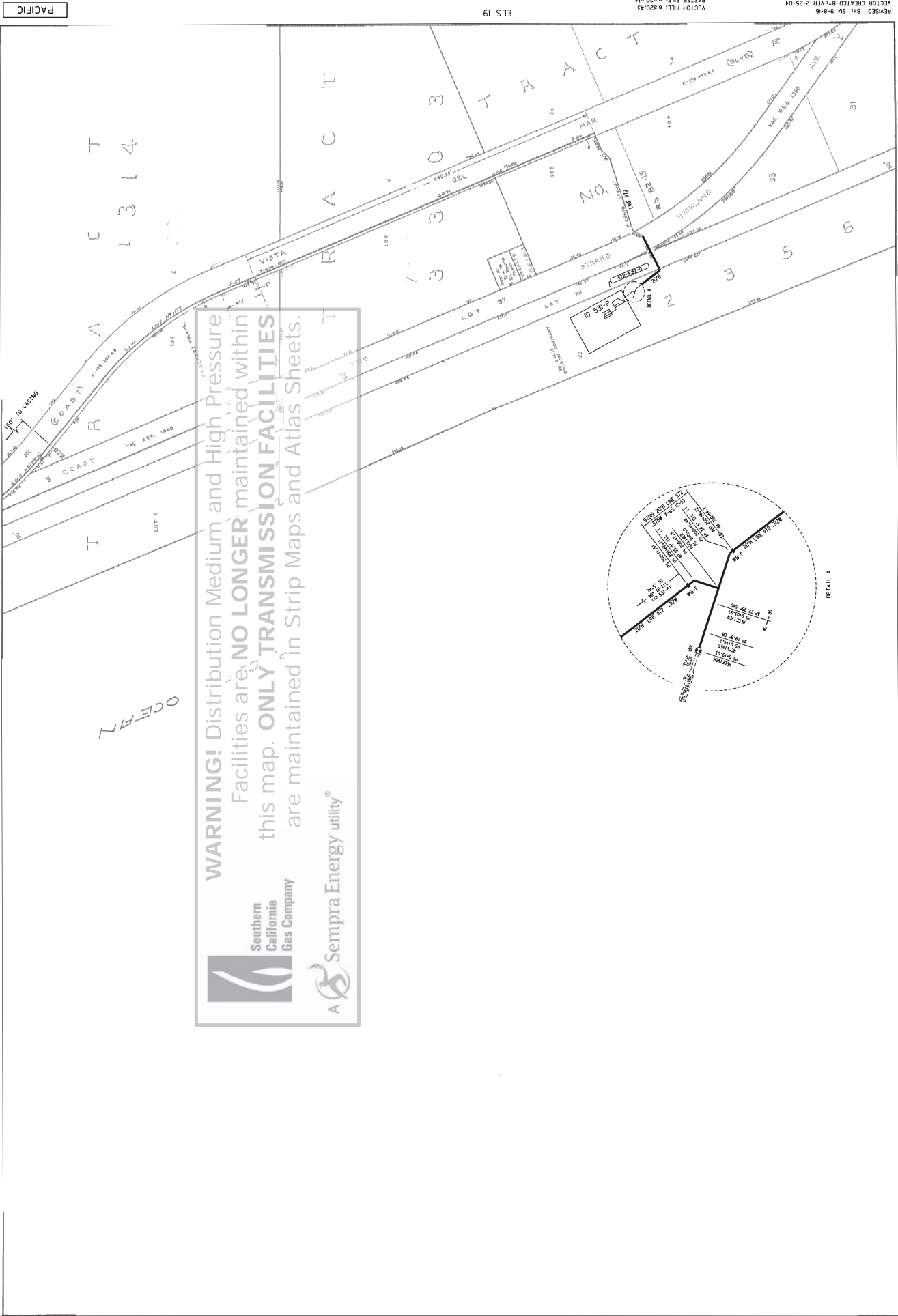
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ELS 14

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RASTER FILE: 4915.K3

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ELS 15



ELS 20



SCOTT S. ...

REVISION BY: SM 9-8-06
 VECTOR CREATED BY: VFR 2-25-04
 MASTER FILE: 0420243
 ELS 19

Notice of Availability of
A Draft Environmental Impact Report



West Basin Municipal Water District

To: All Interested Persons and Agencies

Subject: Notice of Availability of a Draft Environmental Impact Report

Project Title: Ocean Water Desalination Project (SCH # 2015081087)

Lead Agency: West Basin Municipal Water District

Project Location: 301 Vista Del Mar, El Segundo, CA and the surrounding cities of El Segundo, Los Angeles, Manhattan Beach, Hawthorne, Redondo Beach, Gardena, Torrance, Hermosa Beach, and portions of unincorporated Los Angeles County (see Figure 1)

Public Review Period: Tuesday, March 27, 2018 through Friday, May 25, 2018 at 5 P.M.

In accordance with Section 15087 of the State of California Environmental Quality Act (CEQA) Guidelines, this Notice of Availability (NOA) has been prepared to notify responsible and trustee agencies, other public agencies, and any interested parties that West Basin Municipal Water District (West Basin), as the Lead Agency, has prepared a Draft Environmental Impact Report (Draft EIR) for the proposed Ocean Water Desalination Project (Project) pursuant to CEQA. The EIR provides the responsible and trustee agencies, other public agencies, and interested parties, as well as the public, with information about the potential environmental effects anticipated as a result of the Project.

Project Description: West Basin is investigating the feasibility of the construction and operation of an ocean water desalination facility at two potential sites within the existing El Segundo Generating Station (ESGS). The potential desalination facility would produce 20 million gallons per day (MGD) of drinking water (Local Project) with the potential for a future expansion of the facility to produce up to 60 MGD of drinking water (Regional Project). The Local Project would provide a reliable, local water supply to meet drinking water demands, while increasing drought resiliency and reducing dependency on imported water supplies. Currently, West Basin's only water supplies are imported water provided by the Metropolitan Water District of Southern California (MWD). For the Regional Project, West Basin would look to involve partners to expand the Local Project to produce an additional 40 MGD of drinking water to help meet water demands at a regional scale. This would further reduce dependence on imported water within the MWD service area and improve overall regional supply reliability.

The Project would include construction and operation of ocean water intake and concentrate (brine) discharge infrastructure, an onshore desalinated water treatment facility, and a product water conveyance system. The ocean water intake system would intake raw ocean water through 1-mm (0.04 inch) wedgewire screens. The treatment process would include pre-treatment filtration, reverse osmosis membranes, and post treatment conditioning. The concentrate discharge system would return a blend of concentrated ocean water from the reverse osmosis process and treated backwash to the ocean through a diffuser system for dispersion. The desalinated water conveyance system would deliver drinking water to the local drinking water distribution system. Appurtenant facilities, including pump stations, valves, and meters, would also be constructed and operated as part of the Project.

Anticipated Significant Environmental Effects: The Draft EIR describes the potential direct, indirect, and cumulative environmental impacts of the Project. Impacts could occur in the following Environmental Areas: Aesthetics, Lights & Glare; Air Quality; Terrestrial Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land

Comment Letter SOCALGAS

Use and Planning; Marine Biological Resources; Noise; Public Services; Recreation; Transportation and Traffic; and Utilities and Service Systems. Mitigation measures have been incorporated to avoid or minimize significant impacts to less than significant levels where feasible. The EIR concludes that there is potential for significant and unavoidable impacts related to air emissions during construction and increased noise during pile driving associated with construction activities.

CEQA also requires this NOA to specify if the Project site contains any listed toxic sites. The Project site is identified on the "Cortese List" (Government Code Section 65962.5) as having the potential for soil and groundwater contamination at the site from past uses on site and neighboring sites.

Public Review and Comments: Pursuant to Section 15087 of the State CEQA Guidelines, West Basin is soliciting comments from the public, responsible and trustee agencies, other public agencies, and interested parties regarding the content of the Draft EIR prepared for the Project. The Draft EIR will be used by West Basin when considering discretionary approvals related to the Project. The 60-day public review period begins Tuesday, March 27, 2018 and ends Friday, May 25, 2018 at 5 P.M. Written comments submitted by U.S. mail or email on the Draft EIR must be received by Zita Yu, Ph.D., P.E. at the address shown below. A dedicated "Ocean Water Desalination Project Draft EIR Comment Box" will be available in the lobby of the West Basin office in Carson, Calif. for the public to drop off written comments in-person between 8 A.M. and 5 P.M. Monday through Friday, except for the District holidays. A contact name and return address or email address should be included with your comments.

West Basin Municipal Water District
Attn: Zita Yu, Ph.D., P.E., Project Manager
17140 South Avalon Boulevard
Carson, CA 90746
desalEIR@westbasin.org

Document Availability: The Draft EIR can be viewed at www.westbasin.org/desa/. Hard copies of the Draft EIR are available for public review during regular business hours at the locations listed below:

- West Basin Municipal Water District (17140 South Avalon Boulevard, Carson, CA 90746)
- Carson Library (151 East Carson Street, Carson, CA 90745)
- Culver City Julian Dixon Library (4975 Overland Avenue, Culver City, CA 90230)
- El Segundo Public Library (111 West Mariposa Avenue, El Segundo, CA 90245)
- Gardena Mayme Dear Library (1731 West Gardena Boulevard, Gardena, CA 90247)
- Inglewood Public Library (101 West Manchester Boulevard, Inglewood, CA 90301)
- Malibu Library (23519 West Civic Center Way, Malibu, CA 90265)
- Manhattan Beach Library (1320 Highland Avenue, Manhattan Beach, CA 90266)
- Palos Verdes Peninsula Center Library (701 Silver Spur Road, Rolling Hills Estates, CA 90274)
- Redondo Beach Main Library (303 North Pacific Coast Highway, Redondo Beach, CA 90277)
- West Hollywood Public Library (625 N San Vicente Boulevard, West Hollywood, CA 90069)

Public Meeting: Two public meetings will be held to provide Project information and receive public comments on the Draft EIR. The public meetings will be held as follows:

LOCATION: Richmond Street Elementary School (615 Richmond Street, El Segundo, CA 90245)

DATE: April 25, 2018 (Wednesday)

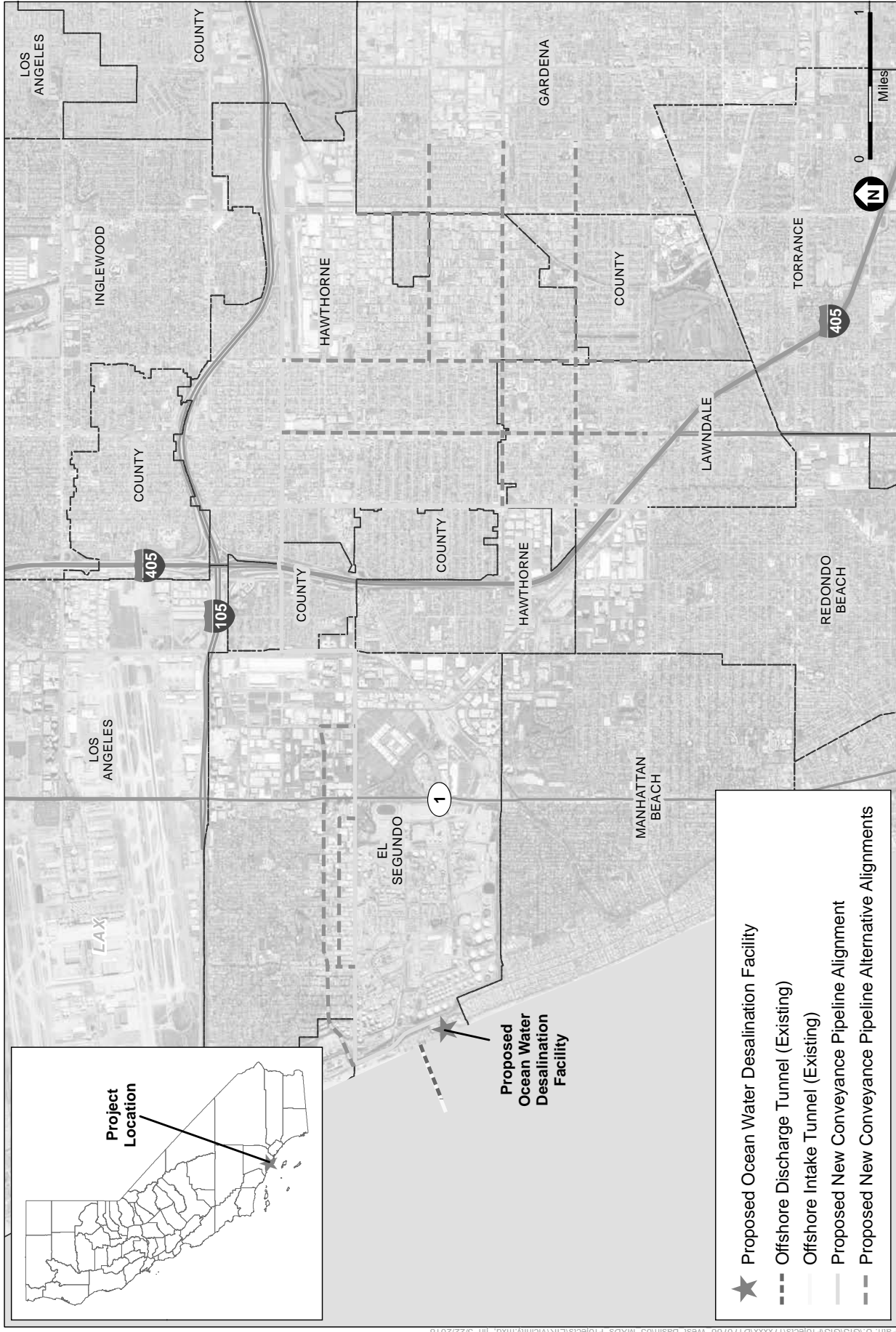
DATE: May 12, 2018 (Saturday)

TIME: 6:00 P.M. – 9:00 P.M.

TIME: 10:00 A.M. – 1:00 P.M.



Upon 72 hours' notice, West Basin Municipal Water District can provide program information and publications in alternate formats or make other accommodations for people with disabilities. In addition, program documents are available at our main office in Carson (17140 South Avalon Boulevard, #210, Carson, CA 90746), which is accessible to individuals with disabilities. To request accommodations ONLY or for more Americans with Disabilities Act information, please contact our Human Resources Manager and Americans with Disabilities Act Coordinator at 310-660-6228 or by email at hr@westbasin.org, Monday through Friday, from 8:00 A.M. to 5:00 P.M., except for the District holidays.



SOURCE: ESRI

West Basin Ocean Water Desalination Project
Figure 1
 Project Location

Path: U:\GIS\Projects\17xxx\170766 West Basin\03 MXDs\Projects\ESR\Vicinity.mxd, In 3/22/2018



James Chuang
Senior Environmental Specialist
Southern California Gas Company
Sempra Energy utilities
GT02A2
555 Fifth Street
Los Angeles, Ca. 90013
Tel: 213-244-5817

July 17, 2018

Dr. Zita Yu, Ph.D., P.E., Project Manager
West Basin Municipal Water District
17140 South Avalon Boulevard
Carson, CA 90746

Re: West Basin Ocean Water Desalination Project

Dear Dr. Zita Yu:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Project’s Draft Environmental Impact Report. SoCalGas understands that West Basin is investigating the feasibility of the construction and operation of an ocean water desalination facility at two potential sites within the El Segundo Generating Station (ESGS). The Project would include construction and operation of ocean water intake and concentrate (brine) discharge infrastructure, an onshore desalinated water treatment facility and a product water conveyance system. We respectfully request that the following comments be incorporated in the Project’s Draft Environmental Impact Report.

SCG2-1

- SoCalGas has a 20” high pressure transmission line that runs underneath the existing access road and connects to the existing natural gas compressor building, which is generally adjacent to the ESGS North Site. Additionally, gas lines run along the public right-of-way along Vista Del Mar, El Segundo Boulevard, Aviation Boulevard, W. 120th Street and Inglewood Avenue. Excavation and trenching for the new desalination water treatment facility and conveyance system may interact with existing gas lines.

SCG2-2

- SoCalGas recommends that the project proponent call Underground Service Alert at 811 or 1 800-422-4133 at least two business days prior to performing any excavation work for the proposed project. Underground Service Alert will coordinate with SoCalGas and other Utility owners in the area to mark the locations of buried utility-owned lines.

SCG2-3

- Should it be determined that the proposed project may require SoCalGas to abandon and/or relocate or otherwise modify any portion of its existing natural gas lines, SoCalGas respectfully requests that the County and/or the project proponent coordinate with us by emailing SoCalGasTransmissionUtilityRequest@semprautilities.com (for transmission line issues) or NorthwestDistributionUtilityRequest@semprautilities.com (for distribution lines issues).

SCG2-4

Once again, we appreciate the opportunity to comment on the Project's Draft Environmental Impact Report. If you have any questions, please feel free to contact SoCalGas Environmental Review at Envreview@semprautilities.com or (213) 244-5817.

↑
SCG2-4

Sincerely,



James Chuang
Senior Environmental Specialist
Southern California Gas Company

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Response to Letter CARS: City of Carson

Response CARS-1

The commenter's statement that desalination should only be used as a last resort is noted for the record. While West Basin appreciates the comment, it expresses an opinion and does not speak to the adequacy of the Draft EIR. See *Master Response: Non-CEQA Issues* and *Master Response: Water Supply Alternatives*.

Response CARS-2

Regarding water rates and cost associated with the proposed Project and economic/social impacts, the commenter is referred to *Master Response: Environmental Justice* (see also Final EIR Section 18) as well as in *Master Response: Non-CEQA Issues*.

Response CARS-3

The Draft EIR Table 7-2 presents the results of the initial screening of alternatives; none of the alternatives were eliminated because of cost. West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. But the expansion of an existing conservation program does not meet the objective of diversification and it puts West Basin at greater risk of relying on customer responses to a rationing program during a drought. For example, in order to achieve the reduction in gallons per capita per day (GPCPD) that has been previously experienced in a drought, it is unlikely that consumer lifestyle/behavioral changes that result from rationing would be sustainable over the long term. See *Master Response: Water Supply Alternatives*.

Response CARS-4

Regarding the commenter's contention that the 10 percent threshold for identifying "meaningfully greater" minority populations compared to the larger population is arbitrary, refer to *Master Response: Environmental Justice* (see also Final EIR Section 18) which revises the approach to identifying minority populations. While the City of Carson's population is included in the West Basin service area, no proposed Project facilities are proposed and no environmental impacts have been identified in the Draft EIR that would specifically affect the residents of the City of Carson. Therefore, individual census tracts within the city are not included in the analysis of potential environmental justice effects of site-specific physical environmental impacts.

Response CARS-5

Regarding the concern about energy intensity impacts from the proposed Project impacting low-income communities in the West Basin service area, the commenter is referred to *Master Response: Environmental Justice* for further information regarding electricity consumption and criteria pollutant emissions. Regarding NO_x emissions, the Draft EIR concludes (as summarized in Table 5.2-8) that construction would result in emissions of NO_x above SCAQMD's published significance thresholds even after all feasible mitigation measures are applied. It is important to note that this conclusion is made based on attainment conditions within the entire South Coast Air Basin and does not necessarily indicate increased impacts within low-income or minority communities compared to higher income or non-minority communities.

Response CARS-6

Starting on page 5.7-19, Draft EIR explains that the threshold of significance used in this document is net carbon neutral; i.e., the proposed Project would have a significant impact on GHG emissions if it were to increase emissions above net carbon neutral as compared to emissions associated with continuing to import water. As stated on page 5.7-26 and 5.7-36 of the Draft EIR, any carbon emissions as a result of the proposed Project would be 100 percent offset through a combination of Project design features and mitigation measures resulting in a net carbon neutral greenhouse gas emissions project when compared to an equivalent volume of MWD imported water. The commenter is also referred to *Master Response: Greenhouse Gas Emissions and Energy Use* for further information regarding the proposed Project's greenhouse gas emissions.

Response CARS-7

See *Master Response: Water Supply Alternatives* and response to comment CARS-3.

Response CARS-8

The Draft EIR Section 7 describes efforts to generate additional local water supplies including increased recycled water through the Water Replenishment District's Groundwater Reliability Improvement Program (GRIP) and Metropolitan's Regional Recycled Water Project. The Draft EIR concludes that ocean water desalination complements other water supply alternatives and supports implementing local water supply development including conservation, recycled water and stormwater capture projects in parallel with ocean desalination.

Response CARS-9

This comment expresses a concern and/or an opinion, and does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. See *Master Response: Non-CEQA Issues*.

Response CARS-10

West Basin notes the City of Carson's contact information for any future correspondence regarding this comment letter.

Response to Letter CULV: City of Culver City

Response CULV-1

West Basin notes Culver City's positions on environmental sustainability. This comment does not speak to the adequacy of the Draft EIR; see *Master Response: Non-CEQA Issues*. See also *Master Response: Water Supply Alternatives*.

Response CULV-2

The Draft EIR Subsection 7.2.1 considered 11 alternatives, including increased conservation, stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse. See Draft EIR Tables 7-1 and 7-2, and *Master Response: Water Supply Alternatives*. See also, *Master Response: GHG Emissions and Energy Use* and *Master Response: Cost and Rates*.

Response CULV-3

Recycled water is a proven technology that is legally feasible and an important component of West Basin's water supply portfolio. See *Master Response: Water Supply Alternatives*.

As explained in Section 7, expanding recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production from Hyperion Water Reclamation Plant to its full capacity, as the Mayor proclaimed in February 2019 would occur by 2035, would not eliminate imported water demands in Southern Los Angeles County. Nor would it eliminate the need for additional water supply diversification afforded by ocean water desalination. As described in EIR Section 7, West Basin as a responsible water supply wholesaler and manager, is considering the addition of ocean water desalination to augment water supply reliability in addition to other local water supply development efforts.

Response CULV-4

The commenter's position to the proposed Project is noted for the record. While West Basin appreciates the comment, it expresses an opinion and does not speak to the adequacy of the Draft EIR. See *Master Response: Non-CEQA Issues* and *Master Response: Water Supply Alternatives*.

Response CULV-5

The Draft EIR Section 7 describes efforts to generate additional local water supplies including increased recycled water for non-potable reuse. The Draft EIR concludes that ocean water desalination complements other water supply alternatives and supports implementing local water supply development including conservation, recycled water and stormwater capture projects in parallel with ocean desalination. See response to comment CULV-3.

Response CULV-6

West Basin recognizes the importance of having a thorough understanding on the costs and benefits of implementing ocean water desalination as a drinking water supply; hence, a study focused on the costs and benefits of project implementation was initiated in January 2019. One of the objectives of this study is to evaluate the potential wholesale water rate increases within West Basin's service area resulting from project implementation. The study will analyze how

affordability may be addressed through the rate making processes for drinking water wholesalers and retailers. The study is expected to be completed in 2020.

Response CULV-7

See *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response CULV-8

See Response to CULV-6.

Response CULV-9

As explained in the Draft EIR Section 3.3, West Basin's goal for the proposed Project is to guarantee future water supply reliability for service area customers by adding a locally produced, drought-proof potable water source to the West Basin supply portfolio. Desalination would be in addition to West Basin's ongoing and continuing conservation and water use efficiency programs, including recycling, water reuse (IPR and DPR), and stormwater capture programs (see Draft EIR Table 2-1). Given the high variability in Southern California's climate and amount of precipitation which is expected to become more variable in the future due to climate change, stormwater capture is not considered a feasible alternative.

The Ballona Creek project would improve downstream water quality in Ballona Creek, Ballona Estuary, Sepulveda Channel, and Centinela Creek during dry weather, providing compliance with Bacteria Total Maximum Daily Load (TMDL). Not only does West Basin not have rights to that water, diversion of that treated water for use by West Basin would undermine the water quality goal of the Ballona Creek project.

See also *Master Response: Water Supply Alternatives*.

Response CULV-10

As discussed in the Draft EIR on page 7-36, the No Project Alternative evaluates water supply sources to be implemented if West Basin does not pursue ocean water desalination. The No Project Alternative includes the continuation of conservation programs and existing supply sources which primarily include recycled water and imported water (see Table 7-4) in addition to groundwater that is available to West Basin's customers. West Basin currently maximizes all feasible water supply alternatives, and will continue to do so under the No Project Alternative whether or not the proposed Project is approved.

However, the collective water supply alternatives identified above and under the No Project Alternative would not meet the objectives of the proposed Project (Draft EIR page 7-40). Maximizing the use of existing sources may reduce some of the need for imported water in the future, but current water supply sources do not holistically improve water security, or reduce the risk of imported water unavailability during drought conditions, and would not collectively eliminate the need for imported water. See *Master Response: Water Supply Alternatives*. West Basin's future water supply diversification would result in a reduction in imported water which would allow for an increase in conservation programs and recycled water, and ocean water desalination should it be approved as a supply source. As noted in the conclusion to the March

2019 Coordinated Strategic Plan to Advance Desalination for Enhanced Water Security¹,
“Desalination is an important part of a comprehensive approach to improve water availability,
resiliency, and security in the U.S.”

¹ A Report by the Desalination Science and Technology Task Force Subcommittee on Water Availability and Quality Committee on Environment, of the National Science & Technology Council, and issued by the Executive Office of the President of the United States.

Response to Letter ELSEG: El Segundo Dept. of Planning and Building Safety

Response ELSEG-1

West Basin notes the City of El Segundo's role as a Responsible Agency under CEQA for the proposed Project. Subsequent responses to comment are provided in ELSEG-2 through ELSEG-3.

Response ELSEG-2

The Draft EIR Section 5.8, *Hazards and Hazardous Materials*, presents the existing conditions relative to hazardous materials. Subsection 5.8.2 describes the known and potentially hazardous building materials in the structures that would be demolished, and the previous soil and groundwater investigations and cleanup actions for contaminated soil and groundwater at the site.

As discussed in Impact HAZ 5.8-1, West Basin is aware that the demolition of Units 3 and 4 at the ESGS North Site may encounter asbestos-containing materials, lead-based paint, polychlorinated biphenyls (PCBs) in fluorescent light ballasts, and/or mercury in fluorescent light tubes where present. The removal and disposal of hazardous building materials are regulated by numerous regulations described in Subsection 5.8.1 including the goals, objectives, policies, and programs of the City of El Segundo General Plan Conservation, Public Safety, and Hazardous Materials and Waste Management Elements that address hazards and hazardous materials. The El Segundo Fire Department is identified as the designated CUPA for the City of El Segundo; Draft EIR pages 5.8-11 and 5.8-12 list the hazardous materials programs under the jurisdiction of the El Segundo Fire Department. West Basin is legally required to comply with the requirements of the programs.

As discussed in the Draft EIR Subsection 5.8.2, numerous investigations and cleanup actions have been conducted at the proposed Project sites. West Basin recognizes that residual levels of contamination may be present and that there is the potential to encounter currently unknown contamination at locations not previously sampled. To address this potential, West Basin has committed to implement Mitigation Measures HAZ-1, Waste Management Plan, and HAZ-2, Project Demolition and Construction Health and Safety Plans. These plans would establish procedures to train workers in the recognition of hazardous materials, establish procedures for monitoring and testing of suspect materials, and establish procedures for the safe and legal containerization, transportation, and disposal of waste materials at licensed facilities permitted to accept the materials. Note that the plans will be submitted to the El Segundo Fire Department for their review and approval.

Response ELSEG-3

This comment lists various permits that the City of El Segundo anticipates West Basin will be required to acquire from the El Segundo Fire Department, beyond those listed in Table 3-11. West Basin agrees that there are additional permits that would apply to the proposed Project and appreciates the City's attention to permit requirements. Note that the chemicals and quantities to be used are listed in Table 3-2. West Basin will comply with all legal requirements including, for

example, requirements for contractors that will handle hazardous materials during construction and the requirement of a Hazardous Materials Business Plan during operations. In addition, West Basin intends to apply for and comply with all required permits. Sections 5.2, *Air Quality*, and 5.8, *Hazards and Hazardous Materials*, list the various requirements in their respective *Regulatory Framework* subsections that are specific to air quality (Section 5.2), and hazardous building materials, and contaminated soil and/or groundwater (Section 5.8).

Response to HAW: City of Hawthorne

Response HAW-1

West Basin notes that the conveyance facilities do traverse through the City of Hawthorne's jurisdiction. Subsequent responses to comment are provided in HAW-2 through HAW-5.

Response HAW-2

As indicated in the Draft EIR in Table 3-11 on page 3-41, West Basin will be required to obtain an encroachment permit from the City of Hawthorne prior to construction.

Response HAW-3

West Basin will coordinate with the City of Hawthorne regarding installation of all pipelines associated with the Project, including paving of roadways.

Response HAW-4

The Draft EIR Table 3-11 identifies the City of Hawthorne as a Local Agency with permit authority for portions of the desalinated water conveyance facilities, which are identified on Figures 3-1 and 3-5.

Response HAW-5

West Basin notes the City of Hawthorne's contact information for any future correspondence regarding this comment letter.

Response to Letter HBCH: City of Hermosa Beach

Response HBCH-1

West Basin's core mission is to ensure a reliable water supply in an economically responsible manner. Although the proposed Project may increase wholesale water rates supplied to local retailers, the ultimate goal of the Project is to stabilize water prices to minimize risks of substantially higher water costs that could occur with a less reliable water supply, which is subject to drought and risk of upset within California's vast water importation systems. As a component of responsible water management planning, any increase in rates caused by the proposed Project would serve to protect against future cost spikes associated with potential imported water system inefficiencies or failure. See also *Master Response: Cost and Rates*.

Response HBCH-2

While West Basin appreciates the comment, it does not specify any deficiencies in the analysis included in the Draft EIR. As a result, this comment has been noted for the record and no further response is necessary; see *Master Response: Non-CEQA Issues*. See also *Master Response: Cost and Rates* and *Master Response: Water Supply Alternatives*.

Response HBCH-3

This comment expresses an opinion about the need and appropriateness of the project, and provides a brief summary of the issues the commenter has on the Draft EIR. For responses to these specific comments, see response to comments HBCH-4 through HBCH-35.

Response HBCH-4

The EIR used the appropriate baseline to evaluate the potential impacts of the proposed Project on marine biological resources. See *Master Response: Marine Biological Resources Study Area*.

Response HBCH-5

See *Master Response: Marine Biological Resources Study Area*.

Response HBCH-6

See *Master Response: Marine Biological Resources Study Area* for an explanation of the validity and adequacy of the marine study area, as it relates to the larger Santa Monica Bay. Additionally, as identified in Section 5.11, *Marine Biological Resources*, in the discussion of potential entrainment (Draft EIR pages 5.11-49 through 5.11-54) and discharge shear stress (Draft EIR pages 5.11-58 through 5.11-60), the CWA 316(b) entrainment studies upon which the Project-related entrainment and shear stress effects were estimated, and APF calculations are based, utilize an area of recruitment within SMB that is much larger than the proposed Project marine study area. Any larval fish or invertebrate taxa that might spawn outside the established marine study area would be reflected in the multi-year data used to analyze these impacts. Similarly, any adults that settle out within SMB, or the greater Southern California Bight, would be reflected in the site data used to identify fish and invertebrate species present within the marine study area. See also Draft EIR Section 5.9, *Hydrology and Water Quality*, Subsection 5.9.4, for a discussion

of the brine dilution modeling conducted for the proposed Project (specifically, Impact HYDRO-5.9-2 on Draft EIR page 5.9-49) and Final EIR Appendix 14.

Response HBCH-7

The Draft EIR provides substantial evidence that project direct and indirect effects on marine habitats and biological resources would be confined to a relatively small area, and would not have the potential to generate impacts to habitats or marine species at greater distances than the Marine Study Area. See *Master Response: Marine Biological Resources Study Area* and response to comment HBCH-6. Regarding the need to assess potential impacts to water quality and marine biological resources outside of the defined Marine Study Area, see *Master Response: Marine Biological Resources Study Area*.

As discussed in the Draft EIR Subsection 5.9.4, consistent with the requirements of the California Ocean Plan for the discharge of desalination brine, the dilution analyses completed in support of the impact assessment assume zero ocean current velocity, representing the worst-case condition in terms of brine dilution with receiving waters. Overall, the effect of ocean currents is to increase dilution compared to the zero current results. Resulting salinities would be substantially lower than those reported in the Draft EIR since greater dilution is achieved through additional dynamic mixing from waves or ocean currents. Neglecting the effect of currents (assuming zero current), consistent with the required methodology prescribed in the Ocean Plan, represents the most conservative (i.e., the “worst-case”) scenario, and therefore, the Ocean Plan regulations related to water quality would continue to be met for all anticipated ocean currents occurring in Santa Monica Bay.

As discussed in the Draft EIR, Santa Monica Bay dissolved oxygen concentrations are generally around 8 mg/l (page 5.9-33). Impacts relating to reduced dissolved oxygen concentrations from the discharge of brine are assessed in the Draft EIR Subsection 5.9.4 under Impact 5.9-2 (pages 5.9-53 and 5.9-54). Based on the receiving water dissolved oxygen content at the proposed diffuser location and the dynamics of brine discharges via a multiport diffuser (Final EIR Appendix 14A), the amount of dissolved oxygen supplied to a discharged dense brine plume by entrained ambient seawater would ensure that dissolved oxygen levels would not be substantially reduced in receiving waters as compared to baseline conditions. Furthermore, the treatment process would involve concentrating source ocean water and hence would not alter the mass loading of organics or oxygen demands. As a result, hypoxia would not occur and impacts relating to decreased dissolved oxygen in Santa Monica Bay would be less than significant.

Response HBCH-8

See *Master Response: Marine Biological Resources Study Area*.

Response HBCH-9

See *Master Response: Marine Biological Resources Study Area* for an explanation of the validity and adequacy of the marine study area. Additionally, as identified in Section 5.11, *Marine Biological Resources*, in the discussion of potential entrainment (Draft EIR pages 5.11-49 through 5.11-54) and discharge shear stress (Draft EIR pages 5.11-58 through 5.11-60), the CWA

316(b) entrainment studies upon which the proposed Project-related entrainment effects were calculated utilize a much larger area of recruitment within SMB than the marine study area. If the Point Dume State Marine Conservation Area contributes any larval fish to the marine study area, this would be reflected in the multi-year data used to analyze the entrainment impacts. Similarly, if any adults from either of the Marine Protected Areas located on either end of SMB immigrated into the marine study area, their presence would be reflected in the site data used to identify fish and invertebrate species present within the marine study area. See *Master Response: Supplemental Studies*; specifically, Comparison of 316(b) Data in SMB (Final EIR Appendix 12). See response to comment HBCH-6.

Response HBCH-10

See *Master Response: Marine Biological Resources Study Area*.

Response HBCH-11

The Draft EIR Section 4.1 presents the approach to the cumulative analysis. As explained in the Draft EIR on page 4-2 to 4-3, both the list approach and the summary of projections approach are used to determine the proposed Project's cumulative impacts, depending upon which approach is appropriate/relevant for any one environmental issue area. Additionally, the geographic area considered for the cumulative analysis varies according to environmental issue area and was determined based upon the proposed Project's scope and anticipated area in which the proposed Project could contribute to an incremental increase in cumulatively considerable impacts. Draft EIR Table 4-2 lists 12 off-shore projects that have been proposed within the Southern California Bight that were considered in the cumulative analysis of *Marine Biological Resources* in Draft EIR Subsection 5.11.5. In addition, potential impacts of the proposed Project are evaluated against baseline conditions, which by definition includes the effects of existing projects that are producing related impacts and those impacts are then evaluated for their contribution to a cumulative impact. The marine resources study area is discussed in *Master Response: Marine Biological Resources Study Area*, and cumulative impacts on marine resources are presented in Draft EIR Subsection 5.11.5. The less than significant proposed Project impacts to marine biological resources would not contribute to a cumulatively considerable impact. For example, underwater noise impacts are relatively localized to the area where impacts occur. Therefore, the potential for reasonably foreseeable noise impacts including cumulative noise impacts are described to the extent that they are reasonably foreseeable given the nature and duration of the anticipated noise sources from both construction and operation and given the nature of existing and cumulative sources of noise. See also response to comment HTB-21.

Response HBCH-12

As the CEQA lead agency, West Basin will use this EIR to review the potential environmental impacts of the proposed Project and to determine whether to approve the proposed Project and pursue permitting, which will include a request to the Los Angeles Regional Water Quality Control Board (LARWQCB) for California Water Code (CWC) Section 13142.5(b) determination (the "Water Code determination"). The LARWQCB must find that the applicant has complied with the Ocean Plan Amendments in order to make the Water Code determination. More specifically, pursuant to Ocean Plan Chapter III.M.2.a.(2), LARWQCB (not the applicant)

must independently analyze a range of feasible alternatives for the best available site, best available design, best available technology, and best available mitigation measures and then must consider all four factors collectively to determine the best combination of feasible alternatives to minimize intake and mortality of all forms of marine life.

CEQA Guidelines Section 15064.7(a) provides that a threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect. The Draft EIR assessment of impacts on water quality from the discharge of proposed Project brine (see Draft EIR Subsection 5.9.4, Impact HYDRO 5.9-2) specifically incorporates the numeric thresholds defined in the Ocean Plan (2 ppt at 100 meters) for determining impacts from operation of the Local and Regional Project. As explained on Draft EIR page 5.9-60, “[T]he impact analysis presented below first assesses salinity increases from Local Project operational discharges and whether such increases comply with California Ocean Plan numeric salinity standards.”

As to the request to add “minimize intakes and mortality to all forms of life” to the threshold of significance, this would not be appropriate because first of all, this determination under the OPA is to be made by the LARWQCB. Furthermore, there is no single criterion to meet this threshold, rather this standard would be applied by the LARWQCB to all components of the proposed Project (siting, design, technology, and mitigation) pursuant to the OPA. However, West Basin has presented as much information as possible to demonstrate consistency with the OPA requirements.

In response to comments on the Draft EIR, and to support future consideration of the proposed Project by permitting agencies, West Basin prepared four supplemental Studies (see *Master Response: Supplemental Studies*). In response to comment LARWQCB-30, West Basin completed an analysis of a linear diffuser (Final EIR Appendix 14A), the objective of which is to minimize the extent of the Brine Mixing Zone and minimize the jet exit velocity in order to minimize mortality of organisms that may be entrained into the jets due to turbulence and shear. West Basin also completed an analysis that compares the existing 316(b) data from the El Segundo Generating Station (ESGS), the Scattergood Generating Station (SGS), and the Redondo Beach Generating Station (RBGS), and evaluates the differences in planktonic species’ variation and densities, and the potential levels of entrainment that could result from a desalination plant at each location. Results of the analysis (Final EIR Appendix 12) indicate that the preferable location for a project’s ocean water intake in coastal California must be as distant as possible from rocky reef/hard substrate habitat, coastal lagoons and estuaries, and marine protected areas (MPAs) in order to minimize the entrainment of larval fish, including special status and managed fish and invertebrate taxa. Based on available data, the evidence indicates the ESGS is the “best available” site in SMB to minimize the intake and mortality of marine life.

The conclusions in the EIR are adequately supported by the technical detail provided for the purposes of determining impacts under CEQA. See *Master Response: CEQA and Ocean Plan Compliance*.

Response HBCH-13

The commenter is correct in asserting that the Ocean Plan Amendments of 2015 (SWRCB 2015), represent "... a starting point" from which, "...more work is needed to understand the long-term impacts of desalinization discharges." As illustrated in the analysis of proposed Project-related possible ocean water entrainment and discharge shear stress mortality, scientific studies conducted since the promulgation of OPA 2015 suggest that both the extent of entrainment that occurs when using wedgewire screened intakes and the magnitude of shear stress induced mortality of planktonic organisms is less than projected by OPA 2015 (Draft EIR pages 5.11-49 through 5.11-60) as illustrated in Draft EIR Tables 5.11-9 and 5.11-12. The APF calculations can vary a minimum of 11-12 percent for entrainment effects and 17-25 percent or more for shear stress effects based on basic operational assumptions and scientific studies showing that only organisms <1 mm in size are affected and that not all planktonic taxa are affected by shear stress turbulence. Mitigation Measure BIO-M2 commits to a level of compensation or offsite habitat restoration based on actual on-site scientific studies that analyze the potential impacts on marine productivity from the proposed Project.

The *Intake Effects Assessment Report* (Tenera 2014, see Draft EIR Appendix 4A) documented the performance of a wedgewire screened ocean intake associated with a demonstration desalination project, and as such is applicable to either the Regional or Local Projects. This study evaluated impingement of planktonic and larval organisms under intake water flow rates of <0.5 fps using a 1.0 mm wedgewire screen. These conditions are the same as those proposed for the Project and therefore, would be applicable to the assessment regardless of actual flow volume. Flow volume only becomes critical in estimating potential total entrainment of planktonic organisms <1.0 mm in size. The analysis of entrainment of these sized organisms is provided for both the Local and Regional Projects in the Draft EIR on pages 5.11-49 through 5.11-54 and as summarized in Draft EIR Tables 5.11-9 and 5.11-12.

The Draft EIR determination is that entrainment and discharge related shear stress impacts are potentially significant and therefore required mitigation, and that the implementation of Mitigation Measure BIO-M2, which includes a commitment of offsite ecological habitat enhancement or financial support of a fee-based mitigation program, would reduce the potential impacts to a less than significant level. As discussed above, the purpose of the post-operation entrainment studies is to more precisely identify and define the potential magnitude of the proposed Project's entrainment and shear stress impacts and to provide the additional science specifically identified by the commenter that is missing and which can only be obtained once a desalinization project in SMB is operational.

Response HBCH-14

The comment correctly cites the conclusion made in the Draft EIR concerning intake entrainment from the proposed Project: "At present, the extent of protection that wedgewire screens could provide to prevent entrainment of larval fish and invertebrates in the Project marine study area is unknown." However, the commenter incorrectly claims what that quoted statement refers to. The potential impacts of planktonic entrainment on marine ecosystems are well established as documented by the SWRCB in the supporting work used to prepare the OPA (SWRCB 2015). As

the commenter indicated, the SWRCB established how all desalination projects that utilize ocean water intakes will assess entrainment effects and how they will offset those impacts to a less than significant level (SWRCB 2015). The commenter should note that Mitigation Measure BIO-M2 includes new, site-specific studies of a coastal desalination operation in SMB that is intended to better understand the magnitude of entrainment by these types of facilities, and the effectiveness of implemented operational controls, and therein reduce some of the uncertainty surrounding the adverse impacts of desalination. Regardless of the findings of these studies, both entrainment and shear stress effects on planktonic taxa and the potential resultant impact on marine ecosystems will be determined by the LARWQCB during the Water Code Determination process, and impacts will be fully mitigated pursuant to the OPA (SWRCB 2015) requirements by West Basin through offsite ecological habitat restoration, consistent with OPA 2015 and as directed by the LARWQCB. See also response to comment MLBU-13.

Response HBCH-15

The Draft EIR addresses the infeasibility of comingling brine with wastewater. See response to comment MBCH3-75. Furthermore, the proposed diffuser design has been adequately analyzed. A supplemental model analysis of dilution was conducted for linear diffuser configurations (see *Master Response: Supplemental Studies* and Final EIR Appendix 14A). The objective of the analysis was to advance the proposed diffuser configuration and to confirm that the proposed diffuser design would comply with the required Ocean Plan criteria for desalination discharges. These criteria are: The salinity increment must be less than 2 ppt within the maximum allowable BMZ of 100 m (328 ft), and the jets must be fully submerged and not impact the water surface. In addition, the analysis identified a liner diffuser configuration that would minimize the extent of the BMZ and minimize the jet exit velocity in order to minimize mortality of organisms that may be entrained into the jets due to turbulence and shear.

Through the assessment, two linear diffuser designs were identified that had a common port spacing and number of ports, and therefore diffuser length, that will meet the required environmental compliance criteria for all potential proposed operational discharge scenarios (see Final EIR Section 11, *Refinements to the Project Description* for details relating to incorporation of the linear diffuser design into the proposed Project). One port diameter is needed for the Local Project operational discharge scenarios and a different diameter is needed for the Regional Project operational discharge scenarios. Therefore, the supplemental dilution analyses identified potential linear diffuser configurations that require only the port diameters be changed when transitioning from the Local Project to Regional Project. See response to comment LARWQCB-30 for additional details.

Response HBCH-16

The Draft EIR does not evaluate the potential impacts of the proposed Project on eelgrass because, contrary to the comment's assertion, there are no submerged aquatic vegetation (SAV) beds, including SAV such as the surfgrass *Phyllospadix* and the eelgrass *Zostera*, in the vicinity of the proposed intake or discharge infrastructure. The reference cited in the comment (Brock et al. 2011) does not identify any eelgrass or surfgrass beds in the vicinity of the proposed Project's intake or discharge infrastructure.

Response HBCH-17

The temperature requirements for existing and new discharges in California coastal waters defined in the SWRCB Thermal Plan are presented in the Draft EIR Subsection 5.9.1 (page 5.9-20). As discussed in the Draft EIR (Subsection 5.9.4, *et seq.*), the assessment of impacts to water quality comprehensively applied and considered the applicable regulations. Dilution model analysis of brine discharges presented in the Final EIR Appendix 14A provides the assumed temperature of the receiving waters of Santa Monica Bay in the vicinity of the proposed discharge point as well as the assumed temperature of the brine discharge. Impact 5.9-2 (Subsection 5.9.4) presents a detailed analysis of potential water quality impacts from operational discharges of brine, including consideration of thermal impacts in the context of the regulatory requirements defined in the SWRCB Thermal Plan.

As discussed under Impact 5.9-2 on page 5.9-56 (see Footnote 21), temperature is a commonly studied parameter due to the practice of commingling brine streams from desalination plants with power plant discharges of cooling water that have high temperatures. Given that the proposed Local and Regional Project would not operate in combination with a power plant or other facility that uses ocean waters for cooling purposes, there would be no heating mechanism or any process that would substantially increase the temperature of the source water as it passes through the treatment units. Therefore, the desalination process would not substantially increase the temperature of the discharged effluent, and thermal impacts on receiving waters would not occur.

Response HBCH-18

Regarding the proposed diffuser configuration see response HBCH-15, LARWQCB-30, and *Master Response: Supplemental Studies* for additional information. Concerning potential marine life shear mortality caused by the jet force of diffusers, as suggested by the commenter, the Draft EIR thoroughly assesses the potential effects of diffuser jets operated at set flow rates on planktonic organisms, using several recent scientific studies (e.g., Foster et al. 2013; Roberts 2018; Jessopp 2007; Zhang 2017) that have evaluated shear stress on planktonic organisms (Draft EIR pages 5.11-58 through 5.11-60). These studies were published after the commenter's cited references. In addition, Mitigation Measure BIO-M2 includes not only offsite ecological habitat enhancement to offset proposed Project related shear stress effects to marine ecosystems, but also proposes conducting additional site-specific studies to determine more accurately the magnitude of those effects, which can only be conducted once the desalinization facility is operational. Regarding impacts related to shear mortality and the supplemental studies analyzing linear diffuser designs, see response to comment LARWQCB-30.

Regarding the need for monitoring of brine discharges and potential unknown consequences to marine biological resources, as described in detail in the Draft EIR Subsections 5.9.1 and 5.9.4 and summarized in the *Master Response: CEQA and Ocean Plan Compliance*, West Basin will prepare and submit information required by the Ocean Plan when submitting the NPDES discharge permit application to the LARWQCB including a Report of Waste Discharge, which will provide a detailed analysis of compliance with the Ocean Plan water quality standards, and a request for a water code determination will require that West Basin prepare and provide the

LARWQCB with a Marine Life Mortality Report as described in Ocean Plan chapter III.M.2.e.(1)(a), and a Mitigation Plan.

Further, and to address potential unknown consequences of different water quality constituents interacting in the marine environment, as part of the NPDES permit application, Whole Effluent Toxicity (WET) testing would be required for the facility point of discharge, representing an integrated approach for assessing the potential for acute and/or chronic toxicity of proposed discharges. WET testing represents a standardized measure of the aggregate toxic effect of an effluent measured directly by a toxicity test and is used to evaluate biological impacts of discharges for NPDES permitting.

The primary objective of WET testing is to ensure that effluent released from industrial and municipal facilities into the nation's waters does not cause unacceptable levels of toxicity to aquatic life. As described in Subsection 5.9.1, the point of compliance for water quality standards relating to operational discharges is the edge of the Zone of Initial Dilution (ZID). Such an approach for water quality standards acknowledges the concept of a regulatory mixing zone where water quality constituent concentrations contained in discharges undergo rapid and substantial reduction via dilution. Within the mixing zone, water quality criteria may be exceeded as long as toxic conditions are prevented. To determine whether an effluent has the potential to be toxic, WET tests are performed on various aquatic test species.

Additionally, as described in detail in the Draft EIR Subsection 5.9.4 (page 5.9-55), West Basin would be required to comply with the Monitoring and Reporting Program requirements of the NPDES Permit and would also be subject to the monitoring and reporting requirements of the California Ocean Plan (described in Subsection 5.9.1). Monitoring requirements under the California Ocean Plan ensure that monitoring be conducted for salinity levels, benthic community health, aquatic life toxicity, and hypoxia and that the monitoring program be consistent with the requirements detailed in Appendix III of the Ocean Plan which specifies monitoring plan framework, scope, and methodological design for determining compliance. The performance standard(s) associated with the monitoring requirements of the California Ocean Plan are defined in Chapter III of the Ocean Plan (Part 4 (a)) and in Appendix III (Part 8) with definitions of terms provided in Appendix II.

Response HBCH-19

Regarding the commenter's concern that the Draft EIR analysis is inconsistent with the thresholds within Appendix F, and that the Draft EIR downplays the extent to which seawater desalination is the most energy-intensive source of water, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Regarding the commenter's concern that the Draft EIR should have analyzed the Project's energy and GHG impacts in comparison to a range of other water supply alternatives that are less energy intensive, see *Master Response: Greenhouse Gas Emissions and Energy Use*, and *Master Response: Water Supply Alternatives*.

Response HBCH-20

West Basin recognizes the energy requirements of different local water supply alternatives, and recognizes that ocean water desalination is more energy-intensive than other local water supplies. However, the demand for water in the West Basin service area cannot be fully met with any one of the local water supply alternatives. The EIR evaluates the proposed Project's energy consumption in Section 5.5 and concludes that although the energy requirements to operate the ocean water desalination would be greater than other water supplies such as recycled water and imported water, the benefit of a drought-resilient water supply balances benefits and risks of the water supply portfolio. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

Regarding the commenter's concern that the Draft EIR does not reference the analysis conducted by the Pacific Institute that compares energy and GHG emissions of seawater desalination to other water supply options, see *Master Response: Greenhouse Gas Emissions and Energy Use*. The Pacific Institute's study concludes that ocean desalination process is energy intensive compared with other water supplies. The EIR acknowledges this in Section 5.5 Energy. West Basin recognizes the energy requirements of different local water supply alternatives, and recognizes that ocean water desalination is more energy-intensive than other local water supplies. However, the project objectives are to diversify water sources in a manner that is economically viable and environmentally responsible. The EIR describes that a diverse water supply portfolio may include sources with varying power requirements and does not preclude any source solely on its energy requirements. The most reliable water source may also have the highest energy demand. This may limit the percentage produced from a particular source, but does not eliminate its value within a diverse and resilient supply portfolio.

The Project objectives of West Basin's proposed Ocean Water Desalination Project are to:

- Diversify West Basin's water source portfolio to increase reliability in the near and intermediate term (5–15 years) and the long term (15–30 years) while reducing reliance on imported water.
- Improve water security through West Basin's increased local control of water supplies and infrastructure.
- Improve West Basin's local control of future water costs and long-term price stability.
- Improve climate resiliency by developing a water source that is less susceptible to hydrologic variability.
- Develop a potable water supply that is economically viable and environmentally responsible.

Response HBCH-21

The Draft EIR does not take credit for future GHG reductions from SCE's electricity generation portfolio. Rather, the Draft EIR states on page 5.5-17 that the electricity demands of the desalination facility and pump stations would be supplied by SCE, which is subject to California's Renewable Portfolio Standards (RPS), and that over time, due to these standards, the electricity available to the Project would include greater contributions from renewable energy supplies. As the energy sector is decarbonized through increased renewable energy the energy intensity of water will also be reduced (CARB 2017). In terms of ocean desalination's relatively

high energy-intensity compared to other water supply alternatives, see *Master Response: Greenhouse Gas Emissions and Energy Use*. Regarding the comment that the Project would result in significant and unavoidable energy impacts, see responses to comments MBCH3-43 and -44.

Response HBCH-22

The Draft EIR Section 5.5.4 explains that the electricity demands of the desalination facility and pump stations would be supplied by SCE, which is subject to California's RPS Program. As a result, the electricity available to the proposed Project will, over time, include greater contributions from renewable energy supplies. The Draft EIR concludes that the small percentage of load increase compared with the regional demand would not jeopardize SCE's ability to meet RPS goals. The small increase in load is well within the CPUC's authorization for SCE's increased power generation as described on page 5.5-24. As described on page 5.5-18, the Project would not result in a wasteful use of energy that would jeopardize the State's GHG reduction goals. Rather, the incremental increase in energy per acre foot of water produced would modestly increase energy demands compared with current regional and local use. Regarding energy conducting infrastructure in the coastal areas, the Draft EIR acknowledges on page 5.5-21 that the final determination for whether additional poles are needed and where they would be located would be determined by SCE in the future. If SCE is required to build additional infrastructure such as power poles, SCE may need to conduct a subsequent assessment.

Response HBCH-23

As lead agency, West Basin has concluded that the amount of GHG emissions associate with the proposed Project would be partially offset by reductions in the need for imported water within its service area. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response HBCH-24

Regarding the commenter's concern that the Draft EIR should have analyzed the Project's energy and GHG impacts in comparison to a range of other water supply alternatives that are less energy intensive, see *Master Response: Greenhouse Gas Emissions and Energy Use*, and *Master Response: Water Supply Alternatives*.

Response HBCH-25

The Draft EIR does not argue that significant impacts of the proposed Project (e.g., on GHG emissions) can be justified compared to impacts of imported water. As explained in the Draft EIR Sections 1.2, *Executive Summary* and 3.3, *Project Objectives*, desalination as a component of West Basin's future water supply portfolio would partially offset the need for imported water. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

The comment asserts that the Draft EIR's position of achieving net neutral GHG emissions fails because "experts agree" ocean desalination will not reduce stresses on freshwater systems; the Draft EIR makes no such claim regarding freshwater resources.

The citation used in the comment comes from a May 2016 report which summarizes "An Uncommon Dialogue" on the coastal and marine impacts of ocean desalination that was

facilitated and organized by Stanford University’s Water in the West, was taken out of context, and is not relevant to the GHG discussion in the Draft EIR. The Uncommon Dialogue had two primary objectives: 1) to promote information exchange and open discussion regarding the best available science, technology and policy related to marine and coastal impacts of desalination projects in California and beyond; and 2) to identify key issues and knowledge gaps for future research and policy development with respect to marine and coastal impacts of ocean desalination in California. Two of the West Basin Draft EIR preparers were invited “experts.”

To put the citation in context, the May 2016 report summarizes the four facilitated sessions; the first session, which is quoted in the comment, was titled, “Scope of Desalination and Current Regulatory Framework in California” and notes that “[t]he current drought, restrictions on historical sources of freshwater and uncertainty stemming from a changing climate are among the factors driving a search for new sources of water for human use — including ocean desalination for coastal populations.” The first finding of this session begins with, “[t]he role of ocean desalination will be minor in the context of California’s overall water budget, although it may be very important in some local areas.” And the entire finding quoted in the comment reads: “Ocean desalination will not, in the foreseeable future, significantly reduce stress on freshwater resources — particularly freshwater ecosystems. Even the highest total projected production of potable water from ocean desalination in California is so low that it will not meaningfully reduce stress on freshwater systems, *such as, for example, exports from the Bay Delta system (Water Plan, 2013). In addition, it is not clear the extent to which planned desalination facilities will provide the regions with supplemental supply and therefore, work to reduce or replace existing demands on groundwater and surface water sources.*” [Emphasis added.]

See also *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response HBCH-26

The Draft EIR does not require the offset of GHG emissions associated with MWD’s imported water. Nor does the Draft EIR’s analysis rely on changes in MWD’s actions. Instead, the analysis considers the reduction of GHG emissions that would result from West Basin’s reduction in use of imported water and compares that to the GHG emissions that would be created by construction and operation of the proposed Project. In other words, West Basin is accounting for the GHG emissions associated with its own water demand, while other recipients of imported water would be responsible for GHG emissions associated with their portfolio. As West Basin modifies its water supply portfolio, its GHG emissions inventory changes associated with each water source. West Basin is not responsible for GHG emissions associated with water imported for other users. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response HBCH-27

Regarding to the commenter’s statement that the Draft EIR ignores the superior alternative of using renewable energy to offset the GHG emissions of a less energy intensive water source, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response HBCH-28

Flooding and coastal hazards and the effects associated with coastal flooding and tsunami impacts, including sea level rise, are discussed in the Draft EIR Section 5.9, *Hydrology and Water Quality*, Impact 5.9-6 on pages 5.9-72 through 5.9-78.

As explained on page 5.9-72, sea level rise is an existing environmental condition, and unless the proposed Project will exacerbate this condition, it is not considered a potentially significant impact under CEQA. In the interest of providing as much information as possible, West Basin conducted a site-specific Coastal Hazards Analysis for the proposed desalination facility at the ESGS North and South Sites, a copy of which is provided as Draft EIR Appendix 5. In response to this and other comments, however, West Basin also prepared a supplemental Coastal Hazards study (see *Master Response: Supplemental Studies* and Final EIR Appendix 15) that considered a high-risk sea level rise projection and the “extreme risk aversion” scenario known as the “H++” scenario. The results of the study confirmed that development on the site would be constrained, but feasible.

Finally, the comment suggests that the proposed Project should be relocated outside of the coastal zone. The Draft EIR on page 7-42 evaluates using the AES site in Redondo Beach. This site was rejected for numerous reasons including greater marine impacts and institutional constraints. As explained further in *Master Response: Supplemental Studies*, detailed technical investigations into subsurface seawater intake options concluded that the proposed Project could not obtain source water through alternative intake mechanisms (e.g., wells located near, but not directly on the shoreline), and that in order for the proposed Project to function, open ocean intakes would be required. Thus, even if the proposed Project as a whole is not determined to be a coastal-dependent development or use, because the intake facilities “... require a site on, or adjacent to, the sea to be able to function at all,” those components are necessarily coastal-dependent per the Coastal Act Section 30101 definition. Accordingly, because the proposed Project would be “dependent upon a coastal-dependent development or use,” it would necessarily be a coastal-related development (Section 30101.3).

Response HBCH-29

The Draft EIR Subsection 7.1.3 explains the proposed Project would result in very few significant and unavoidable impacts and identifies those impacts as air quality and noise during construction. The Draft EIR found that impacts on the marine environment (see EIR Section 5.11 and response to comments HBCH-4 through HBCH-18), water quality (see EIR Section 5.9 and response to comments HBCH-12 and -13), GHG emissions and climate change dynamics (see EIR Sections 5.5 and 5.7 and response to comments HBCH-19 through -27) would be less than significant, or less than significant with mitigation. See response to comment EOGB- 26, and *Master Response: Water Supply Alternatives*.

Response HBCH-30

CEQA Guidelines Section 15126.6 explains that the lead agency, in this case the District, is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives (see Draft EIR Subsection 7.1.4). There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the

rule of reason. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553 and *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376). Although a lead agency may not give a project’s purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need, and not study alternatives that cannot achieve the basic goals of the project. The Draft EIR appropriately analyzed the water supply alternatives as initial screening alternatives and dismissed each of the alternatives due to inability to meet project goals and/or infeasibility. However, the CEQA alternatives (including the No Project Alternative, AES Redondo Beach Generating Station Alternative, Reduced Capacity Alternative, and Reduced Elevation Alternative) were all analyzed in greater depth and meet the range of reasonable alternatives required by CEQA.

See response to comment LAW2-36 and LAW2-39.

The water supply alternatives that were discussed in the Draft EIR (including increased conservation, stormwater capture, and IPR and DPR) contribute to the goal of ensuring future water supply reliability, consistent with goals identified in West Basin’s 2015 Urban Water Management Plan. West Basin’s vision statement from the 2017 to 2022 Strategic Business Plan states the District goal is “sustainable and drought-proof water services enhancing the quality of life and economy of our communities.” As noted throughout the Draft EIR, West Basin continues to develop water supply alternatives in addition to ocean water desalination, representing a responsible, diverse, and balanced water supply portfolio. This includes maintaining and increasing conservation as an integral component of its water supply portfolio. It also includes continuing to provide non-potable recycled water. Therefore, the water supply portfolio inclusive of ocean water desalination (and as analyzed in this EIR) is in fact a hybrid solution. See *Master Response: Water Supply Alternatives*.

Regarding the commenters Footnote 81: As noted by the Water in the West Summary Findings (Leon Szeptycki, et al. 2016, page 7), “Future work is needed to further define the elements of sustainable desalination projects and develop policies to incentivize adoption of those elements. Elements of sustainable desalination identified at the conference included projects that are smaller; that provide supply to meet a specific, clear local demand; that are located away from sensitive and valuable marine areas; and that are powered by renewable energy sources.” The proposed Project would generally satisfy these elements.

Response HBCH-31

As noted in the Draft EIR Subsection 7.1.4, while it is not necessary to perform any further analysis of the screened alternatives, given the interest expressed by the public in the alternatives to the proposed Project, West Basin has included a discussion of Project objectives and a brief discussion of potential impacts for each of the screening alternatives.

But contrary to the comment, the EIR does not evaluate alternatives against costs. The project objectives “control of water” and “control of pricing” focus on control. As explained in the Draft EIR Subsection 7.2.1 for example, increased conservation would not improve West Basin’s local control of future water costs and long-term price stability; the Stormwater Capture Alternative would not improve West Basin’s local control of future water costs and long-term price stability;

the Increased Recycling Alternative would not improve West Basin's local control of future water costs and long-term price stability; as for the indirect potable reuse alternative, greater price certainty would be achieved for those proposed Project components owned by West Basin but less so for the source water facilities owned by the City of Los Angeles. See also *Master Response: Water Supply Alternatives*.

Response HBCH-32

Contrary to the assertion in the comment, the need for 21,500 AFY equates directly to the difference between total supplies and total demands during a multi-dry year event similar to the 2012-2015 drought conditions (20,342 acre-feet in 2020), as shown in UWMP Table 5-5; see response to comment LAW2-37. The shortfall assumes the District continues to manage water supplies and reduce demand for water through the continued implementation of conservation savings, recycled water production, and the expansion of groundwater supplies by the retail agencies, to the maximum extent practicable. Draft EIR Table 2-1 displays the expected increases in these supplies between 2015-2040 (see also West Basin 2015 and 2010 UWMP Table ES-3). As noted in Section 4.5 of the 2015 and the 2010 UWMP, West Basin is actively diversifying its water supply portfolio beyond traditional imported water and groundwater supplies, and both the 2015 and 2010 UWMPs dedicate entire sections to discussing alternative supply programs such as recycled water (Section 9), desalinated ocean water and brackish groundwater (Section 10), and increased water use efficiency programs (Section 7). West Basin is pursuing these alternative supplies as part of its water reliability initiative.

Even with the maximum practicable conservation savings, increases in recycled water production, and expansion of groundwater supplies by retail agencies, West Basin's service area could experience a shortage of 20,342 acre-feet per year by 2020 and 21,500 acre-feet per year by 2025 and beyond. In other words, the proposed Local Project is sized at 20 MGD (or approximately 21,500 AFY), to directly respond to the multi-dry year event shortfall. Thus, the proposed Project would provide the quantity of water necessary to make up the expected shortfall in imported water supplies for what are expected to be more frequent and severe future droughts.

CEQA Guidelines Section 15126.6 requires that an EIR consider alternatives that can avoid or substantially lessen significant impacts of a project. The alternatives in Draft EIR Section 7 (excluding the No Project Alternative) are evaluated based on their ability to accomplish most of the Project objectives (see Subsection 7.1.3) while avoiding or minimizing one or more of the proposed Project's potentially significant impacts identified in EIR Sections 5.1 through 5.16.

See response to comment LAW2-38 and *Master Response: CEQA and Ocean Plan Compliance*, *Master Response: Supplemental Studies* and *Master Response: Water Supply Alternatives*.

Response HBCH-33

Draft EIR Section 3.2 explains that the ocean water intake and concentrate discharge tunnels, installed in 1965 to supply cooling water to the conventional steam turbine units at ESGS (Units 3 and 4), were decommissioned in December 2015. Therefore, the proposed Project, which proposes the use of the existing tunnels, did not contemplate using the once-through-cooling water as diluent for the brine. In response to this and other comments expressing concern about the siting of the proposed Project and associated intake and discharge structures at the ESGS

facility, West Basin reviewed publicly available data for other similar intake and outfall facilities within the Santa Monica Bay. This analysis compares the existing 316(b) data from the ESGS, the Scattergood Generating Station (SGS), and the Redondo Beach Generating Station (RBGS), and evaluates the differences in planktonic species' variation and densities, and the potential levels of entrainment that could result from a desalination plant at each location. Results of the analysis (see Final EIR Appendix 12) indicate that the preferable location for a project's ocean water intake in coastal California must be as distant as possible from rocky reef/hard substrate habitat, coastal lagoons and estuaries, and marine protected areas (MPAs) in order to minimize the entrainment of larval fish, including special status and managed fish and invertebrate taxa. Based on available data, the evidence indicates the ESGS is the "best available" site in SMB to minimize the intake and mortality of marine life. See *Master Response: Supplemental Studies*.

West Basin has chosen to utilize wedgewire screens because they are prescribed by the Ocean Plan Amendment where subsurface intakes are infeasible. As explained in the Draft EIR Sections 1.2, *Executive Summary*, and 3.3, *Project Description*, West Basin's goal is to ensure future water supply reliability for service area customers by adding a locally produced, drought-proof potable water source to the West Basin supply portfolio, consistent with goals for desalinated ocean water supplies identified in West Basin's 2015 Urban Water Management Plan (UWMP). Desalination as a component of West Basin's future water supply portfolio would offset up to 22,500 AFY² of imported water in order to "diversify West Basin's water source portfolio" and would allow West Basin to "increase reliability . . . while reducing reliance on imported water." The EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that a project is likely to have on the environment. Comments on the appropriateness of the project size are not within the scope of CEQA. Nevertheless, these comments are included within the Administrative Record and will contribute to the information that will be considered by the decision-makers in the context of the entire record. See also response to comment LAW2-38, SCLA-3 and EOGB-23 and *Master Response: Water Supply Alternatives*.

Response HBCH-34

The Draft EIR does not extrapolate Local Project impacts to the Regional Project, nor is the Regional Project analysis tiered off the Local Project analysis as asserted by the commenter. As explained in the Draft EIR Section 5.0, *Approach to Analysis*, impacts associated with the Local Project are assessed at a project-level, whereas impacts associated with the Regional Project are assessed at a project-level for those components that are known (such as the physical size of the facility) and a programmatic-level for those aspects of the proposed Project that are not well-defined (such as regional partners). Every topical section in Section 5 (*Environmental Analysis*) distinguishes between the Local Project and the Regional Project when discussing and analyzing the potential impacts of each proposed Project component (i.e., Ocean Water Desalination Facility, Screened Ocean Intake and Concentrate Discharge, Desalinated Water Conveyance Components). The impacts resulting from the Regional Project are sometimes assessed in terms

² Including 1,000 AFY of brackish groundwater desalination that could come from West Basin's existing C. Marvin Brewer Desalter facility.

of the incremental increase against baseline potentially resulting from the additional build out and operation of the Regional Project, in addition to the impacts from the Local Project.

However, in the example cited by the comment (“As with the Local Project ...), the Draft EIR draws the conclusion it does about the Regional Project because that is what the evidence presents, not because of extrapolation or an incremental increase. In the paragraph prior to the text cited in the comment, the Draft EIR explains that Table 5.9-8 summarizes the minimum initial dilution ratios modeled for the proposed operational discharges for the Regional Project, and explains these dilution ratios *are almost identical* to those calculated for the Local Project although the volume of discharge would be greater. As such, the assessed concentrations of water quality constituents at the edge of the ZID (the point of compliance) for the Regional Project would be similar to those reported for the Local Project. Therefore, the Draft EIR correctly concludes that based on modeling of the Regional Project against ambient ocean conditions, *as with the Local Project*, the brine discharge from the Regional Project would not contribute contaminants or increase their concentration significantly over ambient levels beyond the mixing area.

Response HBCH-35

In response to comments, some changes have been made to the EIR to clarify various issues. Also, in response to comments, additional studies were undertaken that merely amplify or clarify the data in the EIR and confirm its impact analyses; those studies also support future regulatory decisions to be made by other agencies. However, neither the methodologies employed nor the conclusions reached have changed in any way that implicates a significant environmental impact not identified in the Draft EIR, a substantially more severe significant environmental effect than indicated, or a new feasible alternative or mitigation measure (CEQA Guidelines Section 15088.5). The questions raised by the commenter, and any revisions that have been made to the Draft EIR in response, are not significant in a way that would require recirculation of, or supplement to, the Draft EIR because they provide additional clarifications, and do not change any of the impact determinations, previously discussed in the Draft EIR. The Draft EIR is comprehensive and robust, compiled by scientists and experts in their respective environmental fields. West Basin as the lead agency under CEQA believes it complies with the requirements of CEQA and is supported with substantial evidence. For these reasons, recirculation of the Draft EIR is not required. The commenter’s suggestion to consider reconfiguring the project is noted for the record. The commenter is also referred to *Master Response: Supplemental Studies*.

Response to Letter MLBU: City of Malibu

Response MLBU-1

West Basin's core mission is to ensure a reliable water supply in an economically responsible manner. Although the proposed Project may increase wholesale water rates supplied to local retailers, the ultimate goal of the proposed Project is to stabilize water prices to minimize risks of substantially higher water costs that could occur with a less reliable water supply, which is subject to drought and risk of upset within California's vast water importation systems. As a component of responsible water management planning, any increase in rates caused by the proposed Project would serve to protect against future cost spikes associated with potential imported water system inefficiencies or failure. See also *Master Response: Cost and Rates*.

Response MLBU-2

While West Basin appreciates the comment, it does not specify any deficiencies in the analysis included in the Draft EIR. As a result, this comment has been noted for the record and no further response is necessary. See *Master Response: Non-CEQA Issues*. See also *Master Response: Cost and Rates* and *Master Response: Water Supply Alternatives*.

Response MLBU-3

This comment expresses an opinion about the need and appropriateness of the project, and provides a brief summary of the issues the commenter has on the Draft EIR. For responses to these specific comments, see response to comments MLBU-4 through MLBU-33.

Response MLBU-4

The EIR used the appropriate baseline to evaluate the potential impacts of the proposed Project on marine biological resources. See *Master Response: Marine Biological Resources Study Area*.

Response MLBU-5

See *Master Response: Marine Biological Resources Study Area* for an explanation of the validity and adequacy of the marine study area, as it relates to the larger Santa Monica Bay. Additionally, as identified in Section 5.11, *Marine Biological Resources*, in the discussion of potential entrainment (Draft EIR pages 5.11-49 through 5.11-54) and discharge shear stress (Draft EIR pages 5.11-58 through 5.11-60), the CWA 316(b) entrainment studies upon which the proposed Project-related entrainment and shear stress effects were estimated, and APF calculations are based, utilize an area of recruitment within SMB that is much larger than the proposed Project marine study area. Any larval fish or invertebrate taxa that might spawn outside the established marine study area would be reflected in the multi-year data used to analyze these impacts. Similarly, any adults that settle out within SMB, or the greater Southern California Bight, would be reflected in the site data used to identify fish and invertebrate species present within the marine study area. See also Draft EIR Section 5.9, *Hydrology and Water Quality*, Subsection 5.9.4, for a discussion of the brine dilution modeling conducted for the proposed Project (specifically, Impact HYDRO-5.9-2 on Draft EIR page 5.9-49) and Final EIR Appendix 14.

Response MLBU-6

The Draft EIR provides substantial evidence that project direct and indirect effects on marine habitats and biological resources would be confined to a relatively small area, and would not have the potential to generate impacts to habitats or marine species at greater distances than the Marine Study Area. See *Master Response: Marine Biological Resources Study Area* and response to comment MLBU-5. Regarding the need to assess potential impacts to water quality and marine biological resources outside of the defined Marine Study Area, see *Master Response: Marine Biological Resources Study Area*.

As discussed in the Draft EIR Subsection 5.9.4, consistent with the requirements of the California Ocean Plan for the discharge of desalination brine, the dilution analyses completed in support of the impact assessment assume zero ocean current velocity, representing the worst-case condition in terms of brine dilution with receiving waters. Overall, the effect of ocean currents is to increase dilution compared to the zero current results. Resulting salinities would be substantially lower than those reported in the Draft EIR since greater dilution is achieved through additional dynamic mixing from waves or ocean currents. Neglecting the effect of currents (assuming zero current), consistent with the required methodology prescribed in the Ocean Plan, represents the most conservative (i.e., the “worst-case”) scenario, and therefore, the Ocean Plan regulations related to water quality would continue to be met for all anticipated ocean currents occurring in Santa Monica Bay.

As discussed in the Draft EIR, Santa Monica Bay dissolved oxygen concentrations are generally around 8 mg/l (page 5.9-33). Impacts relating to reduced dissolved oxygen concentrations from the discharge of brine are assessed in the Draft EIR Subsection 5.9.4 under Impact 5.9-2 (pages 5.9-53 and 5.9-54). Based on the receiving water dissolved oxygen content at the proposed diffuser location and the dynamics of brine discharges via a multiport diffuser (Final EIR Appendix 14A), the amount of dissolved oxygen supplied to a discharged dense brine plume by entrained ambient seawater would ensure that dissolved oxygen levels would not be substantially reduced in receiving waters as compared to baseline conditions. Furthermore, the treatment process would involve concentrating source ocean water and hence would not alter the mass loading of organics or oxygen demands. As a result, hypoxia would not occur and impacts relating to decreased dissolved oxygen in Santa Monica Bay would be less than significant.

Response MLBU-7

See *Master Response: Marine Biological Resources Study Area*.

Response MLBU-8

See *Master Response: Marine Biological Resources Study Area* for an explanation of the validity and adequacy of the marine study area. Additionally, as identified in Section 5.11, *Marine Biological Resources*, in the discussion of potential entrainment (Draft EIR pages 5.11-49 through 5.11-54) and discharge shear stress (Draft EIR pages 5.11-58 through 5.11-60), the CWA 316(b) entrainment studies upon which the proposed Project-related entrainment effects were calculated utilize a much larger area of recruitment within SMB than the marine study area. If the Point Dume State Marine Conservation Area contributes any larval fish to the marine study area,

this would be reflected in the multi-year data used to analyze the entrainment impacts. Similarly, if any adults from either of the Marine Protected Areas located on either end of SMB immigrated into the marine study area, their presence would be reflected in the site data used to identify fish and invertebrate species present within the marine study area. See *Master Response: Supplemental Studies*; specifically, Comparison of 316(b) Data in SMB (Final EIR Appendix 12).

See response to comment MLBU-5.

Response MLBU-9

See *Master Response: Marine Biological Resources Study Area*.

Response MLBU-10

The Draft EIR Section 4.1 presents the approach to the cumulative analysis. As explained in the Draft EIR on page 4-2 to 4-3, both the list approach and the summary of projections approach are used to determine the proposed Project's cumulative impacts, depending upon which approach is appropriate/relevant for any one environmental issue area. Additionally, the geographic area considered for the cumulative analysis varies according to environmental issue area and was determined based upon the proposed Project's scope and anticipated area in which the proposed Project could contribute to an incremental increase in cumulatively considerable impacts. Draft EIR Table 4-2 lists 12 off-shore projects that have been proposed within the Southern California Bight that were considered in the cumulative analysis of Marine Biological Resources in Draft EIR Subsection 5.11.5. In addition, potential impacts of the proposed Project are evaluated against baseline conditions, which by definition includes the effects of existing projects that are producing related impacts and those impacts are then evaluated for their contribution to a cumulative impact. The marine resources study area is discussed in *Master Response: Marine Biological Resources Study Area*, and cumulative impacts on marine resources are presented in Draft EIR Subsection 5.11.5. The less than significant proposed Project impacts to marine biological resources would not contribute to a cumulatively considerable impact. For example, underwater noise impacts are relatively localized to the area where impacts occur. Therefore, the potential for reasonably foreseeable noise impacts including cumulative noise impacts are described to the extent that they are reasonably foreseeable given the nature and duration of the anticipated noise sources from both construction and operation and given the nature of existing and cumulative sources of noise. See also response to comment HBCH-11 and MBCH3-9.

Response MLBU-11

As the CEQA lead agency, West Basin will use this EIR to review the potential environmental impacts of the proposed Project and to determine whether to approve the proposed Project and pursue permitting, which will include a request to the Los Angeles Regional Water Quality Control Board (LARWQCB) for California Water Code (CWC) Section 13142.5(b) determination (the "Water Code determination"). The LARWQCB must find that the applicant has complied with the Ocean Plan Amendments in order to make the Water Code determination. More specifically, pursuant to Ocean Plan Chapter III.M.2.a.(2), LARWQCB (not the applicant) must independently analyze a range of feasible alternatives for the best available site, best available design, best available technology, and best available mitigation measures and then must

consider all four factors collectively to determine the best combination of feasible alternatives to minimize intake and mortality of all forms of marine life.

CEQA Guidelines Section 15064.7(a) provides that a threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect. The Draft EIR assessment of impacts on water quality from the discharge of proposed Project brine (see Draft EIR Subsection 5.9.4, Impact HYDRO 5.9-2) specifically incorporates the numeric thresholds defined in the Ocean Plan (2 ppt at 100 meters) for determining impacts from operation of the Local and Regional Project. As explained on Draft EIR page 5.9-60, “[T]he impact analysis presented below first assesses salinity increases from Local Project operational discharges and whether such increases comply with California Ocean Plan numeric salinity standards.”

As to the request to add “minimize intakes and mortality to all forms of life” to the threshold of significance, this would not be appropriate because first of all, this determination under the OPA is to be made by the LARWQCB. Furthermore, there is no single criterion to meet this threshold, rather this standard would be applied by the LARWQCB to all components of the proposed Project (siting, design, technology, and mitigation) pursuant to the OPA. However, West Basin has presented as much information as possible to demonstrate consistency with the OPA requirements.

In response to comments on the Draft EIR, and to support future consideration of the proposed Project by permitting agencies, West Basin prepared four supplemental Studies (see *Master Response: Supplemental Studies*). In response to comment LARWQCB-30, West Basin completed an analysis of a linear diffuser (Final EIR Appendix 14A), the objective of which is to minimize the extent of the Brine Mixing Zone and minimize the jet exit velocity in order to minimize mortality of organisms that may be entrained into the jets due to turbulence and shear. West Basin also completed an analysis that compares the existing 316(b) data from the El Segundo Generating Station (ESGS), the Scattergood Generating Station (SGS), and the Redondo Beach Generating Station (RBGS), and evaluates the differences in planktonic species’ variation and densities, and the potential levels of entrainment that could result from a desalination plant at each location. Results of the analysis (Final EIR Appendix 12) indicate that the preferable location for a project’s ocean water intake in coastal California must be as distant as possible from rocky reef/hard substrate habitat, coastal lagoons and estuaries, and marine protected areas (MPAs) in order to minimize the entrainment of larval fish, including special status and managed fish and invertebrate taxa. Based on available data, the evidence indicates the ESGS is the “best available” site in SMB to minimize the intake and mortality of marine life.

The conclusions in the EIR are adequately supported by the technical detail provided for the purposes of determining impacts under CEQA. See *Master Response: CEQA and Ocean Plan Compliance*.

Response MLBU-12

The commenter is correct in asserting that the Ocean Plan Amendments of 2015 (SWRCB 2015), represent “... a starting point” from which, “...more work is needed to understand the long-term impacts of desalinization discharges.” As illustrated in the analysis of proposed Project-related

possible ocean water entrainment and discharge shear stress mortality, scientific studies conducted since the promulgation of OPA 2015 suggest that both the extent of entrainment that occurs when using wedgewire screened intakes and the magnitude of shear stress induced mortality of planktonic organisms is less than projected by OPA 2015 (Draft EIR pages 5.11-49 through 5.11-60) as illustrated in Draft EIR Tables 5.11-9 and 5.11-12. The APF calculations can vary a minimum of 11-12 percent for entrainment effects and 17-25 percent or more for shear stress effects based on basic operational assumptions and scientific studies showing that only organisms <1 mm in size are affected and that not all planktonic taxa are affected by shear stress turbulence. Mitigation Measure BIO-M2 commits to a level of compensation or offsite habitat restoration based on actual on-site scientific studies that analyze the potential impacts on marine productivity from the proposed Project.

The *Intake Effects Assessment Report* (Tenera 2014, see Draft EIR Appendix 4A) documented the performance of a wedgewire screened ocean intake associated with a demonstration desalination project, and as such is applicable to either the Regional or Local Projects. This study evaluated impingement of planktonic and larval organisms under intake water flow rates of <0.5 fps using a 1.0 mm wedgewire screen. These conditions are the same as those proposed for the proposed Project and therefore, would be applicable to the assessment regardless of actual flow volume. Flow volume only becomes critical in estimating potential total entrainment of planktonic organisms <1.0 mm in size. The analysis of entrainment of these sized organisms is provided for both the Local and Regional Projects in the Draft EIR on pages 5.11-49 through 5.11-54 and as summarized in Draft EIR Tables 5.11-9 and 5.11-12.

The Draft EIR determination is that entrainment and discharge related shear stress impacts are potentially significant and therefore required mitigation, and that the implementation of Mitigation Measure BIO-M2, which includes a commitment of offsite ecological habitat enhancement or financial support of a fee-based mitigation program, would reduce the potential impacts to a less than significant level. As discussed above, the purpose of the post-operation entrainment studies is to more precisely identify and define the potential magnitude of the proposed Project's entrainment and shear stress impacts and to provide the additional science specifically identified by the commenter that is missing and which can only be obtained once a desalination project in SMB is operational.

Response MLBU-13

The comment correctly cites the conclusion in the Draft EIR concerning intake entrainment from the proposed Project: "At present, the extent of protection that wedgewire screens could provide to prevent entrainment of larval fish and invertebrates in the Project marine study area is unknown." However, the comment incorrectly claims what that quoted statement refers to. The potential impacts of planktonic entrainment on marine ecosystems are well established as documented by the SWRCB in the supporting work used to prepare the OPA (SWRCB 2015). As the commenter indicated, the SWRCB established how all desalination projects that utilize ocean water intakes will assess entrainment effects and how they will offset those impacts to a less than significant level (SWRCB 2015). The commenter should note that Mitigation Measure BIO-M2 includes new, site-specific studies of a coastal desalination operation in SMB that is intended to improve the understanding of the magnitude of entrainment by these types of facilities, and the

effectiveness of implemented operational controls, and therein reduce some of the uncertainty associated with the adverse impacts of desalination. Regardless of the findings of these studies, both entrainment and shear stress effects on planktonic taxa and the potential resultant impact on marine ecosystems, will be determined by the LARWQCB during the Water Code Determination process, and impacts will be fully mitigated by West Basin through offsite ecological habitat restoration, consistent with OPA 2015 and as directed by the LARWQCB. See also response to comment HBCH-14.

Response MLBU-14

The Draft EIR addresses the infeasibility of comingling brine with wastewater. See response to comment MBCH3-75. Furthermore, the proposed diffuser design has been adequately analyzed. A supplemental model analysis of dilution was conducted for linear diffuser configurations (see *Master Response: Supplemental Studies* and Final EIR Appendix 14A). The objective of the analysis was to advance the proposed diffuser configuration and to confirm that the proposed diffuser design would comply with the required Ocean Plan criteria for desalination discharges. These criteria are: The salinity increment must be less than 2 ppt within the maximum allowable BMZ of 100 m (328 ft), and the jets must be fully submerged and not impact the water surface. In addition, the analysis identified a liner diffuser configuration that would minimize the extent of the BMZ and minimize the jet exit velocity in order to minimize mortality of organisms that may be entrained into the jets due to turbulence and shear.

Through the assessment, two linear diffuser designs were identified that had a common port spacing and number of ports, and therefore diffuser length, that will meet the required environmental compliance criteria for all potential proposed operational discharge scenarios (see Final EIR Section 11, *Refinements to the Project Description* for details relating to incorporation of the linear diffuser design into the proposed Project). One port diameter is needed for the Local Project operational discharge scenarios and a different diameter for the Regional Project operational discharge scenarios. Therefore, the supplemental dilution analyses identified potential linear diffuser configurations that require only the port diameters be changed when transitioning from the Local Project to Regional Project. See response to comment LARWQCB-30 for additional details.

Response MLBU-15

The Draft EIR does not evaluate the potential impacts of the proposed Project on eelgrass because, contrary to the comment's assertion, there are no submerged aquatic vegetation (SAV) beds, including SAV such as the surfgrass *Phyllospadix* and the eelgrass *Zostera*, in the vicinity of the proposed intake or discharge infrastructure. The reference cited in the comment (Brock et al. 2011) does not identify any eelgrass or surfgrass beds in the vicinity of the proposed Project's intake or discharge infrastructure.

Response MLBU-16

The temperature requirements for existing and new discharges in California coastal waters defined in the SWRCB Thermal Plan are presented in the Draft EIR Subsection 5.9.1 on page 5.9-20. As discussed in the Draft EIR (Subsection 5.9.4, *et seq.*), the assessment of impacts to

water quality comprehensively applied and considered the applicable regulations. Dilution model analysis of brine discharges presented in the Final EIR Appendix 14A provides the assumed temperature of the receiving waters of Santa Monica Bay in the vicinity of the proposed discharge point as well as the assumed temperature of the brine discharge. Impact 5.9-2 (Subsection 5.9.4) presents a detailed analysis of potential water quality impacts from operational discharges of brine, including consideration of thermal impacts in the context of the regulatory requirements defined in the SWRCB Thermal Plan.

As discussed under Impact 5.9-2 on page 5.9-56 (see Footnote 21), temperature is a commonly studied parameter due to the practice of commingling brine streams from desalination plants with power plant discharges of cooling water that have high temperatures. Given that the proposed Local and Regional Project would not operate in combination with a power plant or other facility that uses ocean waters for cooling purposes, there would be no heating mechanism or any process that would substantially increase the temperature of the source water as it passes through the treatment units. Therefore, the desalination process would not substantially increase the temperature of the discharged effluent, and thermal impacts on receiving waters would not occur. See also response to comment HBCH-17.

Response MLBU-17

Regarding the proposed diffuser configuration see response MLBU-14 and *Master Response: Supplemental Studies* for additional information. Concerning potential marine life shear mortality caused by the jet force of the diffusers, as suggested by the commenter, the Draft EIR thoroughly assesses the potential effects of diffuser jets operated at set flow rates on planktonic organisms, using several recent scientific studies (e.g. Foster et al. 2013; Roberts 2018; Jessopp 2007; Zhang 2017) that have evaluated shear stress on planktonic organisms (Draft EIR pages 5.11-58 through 5.11-60). These studies were published after the reference cited by the commenter. In addition, Mitigation Measure BIO-M2 includes not only offsite ecological habitat enhancement to offset proposed Project related shear stress effects to marine ecosystems, but also proposes conducting additional site-specific studies to determine more accurately the magnitude of those effects, which can only be conducted once the desalinization facility is operational. Regarding impacts related to shear mortality and the supplemental studies analyzing linear diffuser designs, see response to comment LARWQCB-30 and HBCH-18.

Regarding the need for monitoring of brine discharges and potential unknown consequences to marine biological resources, as described in detail in the Draft EIR Subsections 5.9.1 and 5.9.4 and summarized in the *Master Response: CEQA and Ocean Plan Compliance*, West Basin will prepare and submit information required by the Ocean Plan when submitting the NPDES discharge permit application to the LARWQCB including a Report of Waste Discharge, which will provide a detailed analysis of compliance with the Ocean Plan water quality standards, and a request for a water code determination will require that West Basin prepare and provide the LARWQCB with a Marine Life Mortality Report as described in Ocean Plan chapter III.M.2.e.(1)(a), and a Mitigation Plan.

Further, and to address potential unknown consequences of different water quality constituents interacting in the marine environment, as part of the NPDES permit application, Whole Effluent

Toxicity (WET) testing would be required for the facility point of discharge, representing an integrated approach for assessing the potential for acute and/or chronic toxicity of proposed discharges. WET testing represents a standardized measure of the aggregate toxic effect of an effluent measured directly by a toxicity test and is used to evaluate biological impacts of discharges for NPDES permitting.

The primary objective of WET testing is to ensure that effluent released from industrial and municipal facilities into the nation's waters does not cause unacceptable levels of toxicity to aquatic life. As described in Subsection 5.9.1, the point of compliance for water quality standards relating to operational discharges is the edge of the Zone of Initial Dilution (ZID). Such an approach for water quality standards acknowledges the concept of a regulatory mixing zone where water quality constituent concentrations contained in discharges undergo rapid and substantial reduction via dilution. Within the mixing zone, water quality criteria may be exceeded as long as toxic conditions are prevented. To determine whether an effluent has the potential to be toxic, WET tests are performed on various aquatic test species.

Additionally, as described in detail in the Draft EIR Subsection 5.9.4 (page 5.9-55), West Basin would be required to comply with the Monitoring and Reporting Program requirements of the NPDES Permit and would also be subject to the monitoring and reporting requirements of the California Ocean Plan (described in Subsection 5.9.1). Monitoring requirements under the California Ocean Plan ensure that monitoring be conducted for salinity levels, benthic community health, aquatic life toxicity, and hypoxia and that the monitoring program be consistent with the requirements detailed in Appendix III of the Ocean Plan which specifies monitoring plan framework, scope, and methodological design for determining compliance. The performance standard(s) associated with the monitoring requirements of the California Ocean Plan are defined in Chapter III of the Ocean Plan (Part 4 (a)) and in Appendix III (Part 8) with definitions of terms provided in Appendix II.

Response MLBU-18

Regarding the commenter's concern that the Draft EIR analysis is inconsistent with the thresholds within Appendix F, and that the Draft EIR downplays the extent to which seawater desalination is the most energy-intensive source of water, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Regarding the commenter's concern that the Draft EIR should have analyzed the Project's energy and GHG impacts in comparison to a range of other water supply alternatives that are less energy intensive, see *Master Response: Greenhouse Gas Emissions and Energy Use*, and *Master Response: Water Supply Alternatives*.

Response MLBU-19

West Basin recognizes the energy requirements of different local water supply alternatives, and recognizes that ocean water desalination is more energy-intensive than other local water supplies. However, the demand for water in the West Basin service area cannot be fully met with any one of the local water supply alternatives. The EIR evaluates the proposed Project's energy

consumption in Section 5.5 and concludes that although the energy requirements to operate the ocean water desalination would be greater than other water supplies such as recycled water and imported water, the benefit of a drought-proof water supply balances benefits and risks of the water supply portfolio. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

Regarding the commenter's concern that the Draft EIR does not reference the analysis conducted by the Pacific Institute that compares energy and GHG emissions of seawater desalination to other water supply options, see *Master Response: Greenhouse Gas Emissions and Energy Use*. The Pacific Institute's study concludes that ocean desalination process is energy intensive compared with other water supplies. The EIR acknowledges this in Section 5.5 Energy. West Basin recognizes the energy requirements of different local water supply alternatives, and recognizes that ocean water desalination is more energy-intensive than other local water supplies. However, the project objectives are to diversify water sources in a manner that is economically viable and environmentally responsible. The EIR describes that a diverse water supply portfolio may include sources with varying power requirements and does not preclude any source solely on its energy requirements. The most reliable water source may also have the highest energy demand. This may limit the percentage produced from a particular source, but does not eliminate its value within a diverse and resilient supply portfolio.

The Project objectives of West Basin's proposed Ocean Water Desalination Project are to:

- Diversify West Basin's water source portfolio to increase reliability in the near and intermediate term (5–15 years) and the long term (15–30 years) while reducing reliance on imported water.
- Improve water security through West Basin's increased local control of water supplies and infrastructure.
- Improve West Basin's local control of future water costs and long-term price stability.
- Improve climate resiliency by developing a water source that is less susceptible to hydrologic variability.
- Develop a potable water supply that is economically viable and environmentally responsible.

Response MLBU-20

Regarding the commenter's statement that the Project would result in significant and unavoidable energy impacts, see responses to comments MBCH3-43 and -44 and *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MLBU-21

The Draft EIR Section 5.5.4 explains that the electricity demands of the desalination facility and pump stations would be supplied by SCE, which is subject to California's RPS Program. As a result, the electricity available to the proposed Project will, over time, include greater contributions from renewable energy supplies. The Draft EIR concludes that the small percentage of load increase compared with the regional demand would not jeopardize SCE's ability to meet RPS goals. The small increase in load is well within the CPUC's authorization for SCE's increased power generation as described on page 5.5-24. As described on page 5.5-18, the Project

would not result in a wasteful use of energy that would jeopardize the State’s GHG reduction goals. Rather, the incremental increase in energy per acre foot of water produced would modestly increase energy demands compared with current regional and local use. Regarding energy conducting infrastructure in the coastal areas, the Draft EIR acknowledges on page 5.5-21 that the final determination for whether additional poles are needed and where they would be located would be determined by SCE in the future. If SCE is required to build additional infrastructure such as power poles, SCE may need to conduct a subsequent assessment.

Response MLBU-22

As lead agency, West Basin has concluded that the amount of GHG emissions associate with the proposed Project would be partially offset by reductions in the need for imported water within its service area. See *Master Response: Greenhouse Gas Emissions and Energy Use*. Regarding the commenter’s concern that the Draft EIR should have analyzed the Project’s energy and GHG impacts in comparison to a range of other water supply alternatives that are less energy intensive, see *Master Response: Greenhouse Gas Emissions and Energy Use*, and *Master Response: Water Supply Alternatives*.

Response MLBU-23

The Draft EIR does not argue that significant impacts of the proposed Project (e.g., on GHG emissions) can be justified compared to impacts of imported water. As explained in the Draft EIR Sections 1.2, *Executive Summary* and 3.3, *Project Objectives*, desalination as a component of West Basin’s future water supply portfolio would partially offset the need for imported water. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

The commenter asserts that the Draft EIR’s position of achieving net neutral GHG emissions fails because “experts agree” ocean desalination will not reduce stresses on freshwater systems; the Draft EIR makes no such claim regarding freshwater resources.

The citation used in the comment comes from a May 2016 report which summarizes “An Uncommon Dialogue” on the coastal and marine impacts of ocean desalination that was facilitated and organized by Stanford University’s Water in the West, was taken out of context, and is not relevant to the GHG discussion in the Draft EIR. The Uncommon Dialogue had two primary objectives: 1) to promote information exchange and open discussion regarding the best available science, technology and policy related to marine and coastal impacts of desalination projects in California and beyond; and 2) to identify key issues and knowledge gaps for future research and policy development with respect to marine and coastal impacts of ocean desalination in California. Two of the West Basin Draft EIR preparers were invited “experts.”

To put the citation in context, the May 2016 report summarizes the four facilitated sessions; the first session, which is quoted in the comment, was titled, “Scope of Desalination and Current Regulatory Framework in California” and notes that “[t]he current drought, restrictions on historical sources of freshwater and uncertainty stemming from a changing climate are among the factors driving a search for new sources of water for human use — including ocean desalination for coastal populations.” The first finding of this session begins with, “[t]he role of ocean desalination will be minor in the context of California’s overall water budget, although it may be very important in some local areas.” And the entire finding quoted in the comment reads: “Ocean

desalination will not, in the foreseeable future, significantly reduce stress on freshwater resources — particularly freshwater ecosystems. Even the highest total projected production of potable water from ocean desalination in California is so low that it will not meaningfully reduce stress on freshwater systems, *such as, for example, exports from the Bay Delta system (Water Plan, 2013). In addition, it is not clear the extent to which planned desalination facilities will provide the regions with supplemental supply and therefore, work to reduce or replace existing demands on groundwater and surface water sources.*” [Emphasis added.]

See also *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MLBU-24

The Draft EIR does not require the offset of GHG emissions associated with MWD’s imported water. Nor does the Draft EIR’s analysis rely on changes in MWD’s actions. Instead, the analysis considers the reduction of GHG emissions that would result from West Basin’s reduction in use of imported water and compares that to the GHG emissions that would be created by construction and operation of the proposed Project. In other words, West Basin is accounting for the GHG emissions associated with its own water demand, while other recipients of imported water would be responsible for GHG emissions associated with their portfolio. As West Basin modifies its water supply portfolio, its GHG emissions inventory changes associated with each water source. West Basin is not responsible for GHG emissions associated with water imported for other users. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MLBU-25

Regarding to the commenter’s statement that the Draft EIR ignores the superior alternative of using renewable energy to offset the GHG emissions of a less energy intensive water source, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MLBU-26

Flooding and coastal hazards and the effects associated with coastal flooding and tsunami impacts, including sea level rise, are discussed in the Draft EIR Section 5.9, *Hydrology and Water Quality*, Impact 5.9-6 on pages 5.9-72 through 5.9-78.

As explained on page 5.9-72, sea level rise is an existing environmental condition, and unless the proposed Project will exacerbate this condition, it is not considered a potentially significant impact under CEQA. In the interest of providing as much information as possible, West Basin conducted a site-specific Coastal Hazards Analysis for the proposed desalination facility at the ESGS North and South Sites, a copy of which is provided as Draft EIR Appendix 5. In response to this and other comments, however, West Basin also prepared a supplemental Coastal Hazards study (see *Master Response: Supplemental Studies*) that considered a high-risk sea level rise projection and the “extreme risk aversion” scenario known as the “H++” scenario. The results of the study confirmed that development on the site is feasible.

Finally, the comment suggests that the proposed Project be relocated outside of the coastal zone. The Draft EIR on page 7-42 evaluates using the AES site in Redondo Beach. This site was rejected for numerous reasons presented in the discussion including greater marine impacts and

institutional constraints. As explained further in *Master Response: Supplemental Studies*, detailed technical investigations into subsurface intake options concluded that the proposed Project could not obtain source water through alternative intake mechanisms (e.g., wells located near, but not directly on the shoreline), and that in order for the proposed Project to function, open ocean intakes would be required. Thus, even if the proposed Project as a whole is not determined to be a coastal-dependent development or use, because the intake facilities “...require a site on, or adjacent to, the sea to be able to function at all,” those components are necessarily coastal-dependent per the Coastal Act Section 30101 definition. Accordingly, because the proposed Project would be “dependent upon a coastal-dependent development or use,” it would necessarily be a coastal-related development (Section 30101.3).

Response MLBU-27

The Draft EIR Subsection 7.1.3 explains the proposed Project would result in very few significant and unavoidable impacts and identifies those impacts as air quality and noise during construction. The Draft EIR found that impacts on other topical areas such as energy, GHG emissions, water quality, and the marine environment, among others, would be less than significant, or less than significant with mitigation (see Draft EIR Sections 5.5, 5.7, 5.9, and 5.11, respectively). See response to comment HBCH-29 and *Master Response: Water Supply Alternatives*.

Response MLBU-28

CEQA Guidelines Section 15126.6 explains that the lead agency, in this case the District, is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives (see Draft EIR Subsection 7.1.4). There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553 and *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376). Although a lead agency may not give a project’s purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need, and not study alternatives that cannot achieve the basic goals of the project. The Draft EIR appropriately analyzed the water supply alternatives as initial screening alternatives and dismissed each of the alternatives due to inability to meet project goals and/or infeasibility. However, the CEQA alternatives (including the No Project Alternative, AES Redondo Beach Generating Station Alternative, Reduced Capacity Alternative, and Reduced Elevation Alternative) were all analyzed in greater depth and meet the range of reasonable alternatives required by CEQA.

The water supply alternatives that were discussed in the Draft EIR (including increased conservation, stormwater capture, and IPR and DPR) contribute to the goal of ensuring future water supply reliability, consistent with goals identified in West Basin’s 2015 Urban Water Management Plan. West Basin’s vision statement from the 2017 to 2022 Strategic Business Plan states the District goal is “sustainable and drought-proof water services enhancing the quality of life and economy of our communities.” As noted throughout the Draft EIR, West Basin continues to develop water supply alternatives in addition to ocean water desalination, representing a responsible, diverse, and balanced water supply portfolio. This includes maintaining and increasing conservation as an integral component of its water supply portfolio. It also includes

continuing to provide non-potable recycled water. Therefore, the water supply portfolio inclusive of ocean water desalination (and as analyzed in this EIR) is in fact a hybrid solution. See response to comment HBCH-32, LAW2-38 and *Master Response: Water Supply Alternatives*.

Regarding the commenter's Footnote 74: as noted by the Water in the West Summary Findings (Leon Szeptycki et al. 2016, page 7), "Future work is needed to further define the elements of sustainable desalination projects and develop policies to incentivize adoption of those elements. Elements of sustainable desalination identified at the conference included projects that are smaller; that provide supply to meet a specific, clear local demand; that are located away from sensitive and valuable marine areas; and that are powered by renewable energy sources." The proposed Project would generally satisfy these elements.

Response MLBU-29

As noted in the Draft EIR Subsection 7.1.4, while it is not necessary to perform any further analysis of the screened alternatives, given the interest expressed by the public in the alternatives to the proposed Project, West Basin has included a discussion of Project objectives and a brief discussion of potential impacts for each of the screening alternatives.

But contrary to the comment, the EIR does not evaluate alternatives against costs. The project objectives "control of water" and "control of pricing" focus on control. As explained in the Draft EIR Subsection 7.2.1 for example, increased conservation would not improve West Basin's local control of future water costs and long-term price stability; the Stormwater Capture Alternative would not improve West Basin's local control of future water costs and long-term price stability; the Increased Recycling Alternative would not improve West Basin's local control of future water costs and long-term price stability; as for the indirect potable reuse alternative, greater price certainty would be achieved for those proposed Project components owned by West Basin but less so for the source water facilities owned by the City of Los Angeles. See also *Master Response: Water Supply Alternatives*.

Response MLBU-30

Contrary to the assertion in the comment, the need for 21,500 AFY equates directly to the difference between total supplies and total demands during a multi-dry year event similar to the 2012-2015 drought conditions (20,342 acre-feet in 2020), as shown in UWMP Table 5-5; see response to comment LAW2-37. The shortfall assumes the District continues to manage water supplies and reduce demand for water through the continued implementation of conservation savings, recycled water production, and the expansion of groundwater supplies by the retail agencies, to the maximum extent practicable. West Basin 2010 and 2015 UWMPs Table ES-3 display the expected increases in these supplies between 2010-2035 and 2015-2040, respectively. Draft EIR Table 2-1 also displays the increases between 2015 and 2040. As noted in Section 4.5 of the 2015 and the 2010 UWMP, West Basin is actively diversifying its water supply portfolio beyond traditional imported water and groundwater supplies, and both the 2015 and 2010 UWMPs dedicate entire sections to discussing alternative supply programs such as recycled water (Section 9), desalinated ocean water and brackish groundwater (Section 10), and increased water use efficiency programs (Section 7). West Basin is pursuing these alternative supplies as part of its water reliability initiative.

Even with the maximum practicable conservation savings, increases in recycled water production, and expansion of groundwater supplies by retail agencies, West Basin's service area could experience a shortage of 20,342 acre-feet per year by 2020 and 21,500 acre-feet per year by 2025 and beyond. In other words, the proposed Local Project is sized at 20 MGD (or approximately 21,500 AFY), to directly respond to the multi-dry year event shortfall. Thus, the proposed Project would provide the quantity of water necessary to make up the expected shortfall in imported water supplies for what are expected to be more frequent and severe future droughts.

CEQA Guidelines Section 15126.6 requires that an EIR consider alternatives that can avoid or substantially lessen significant impacts of a project. The alternatives in Draft EIR Section 7 (excluding the No Project Alternative) are evaluated based on their ability to accomplish most of the Project objectives (see Subsection 7.1.3) while avoiding or minimizing one or more of the proposed Project's potentially significant impacts identified in EIR Sections 5.1 through 5.16.

See response to comment LAW2-38 and *Master Response: CEQA and Ocean Plan Compliance*, *Master Response: Supplemental Studies* and *Master Response: Water Supply Alternatives*.

Response MLBU-31

Draft EIR Section 3.2 explains that the ocean water intake and concentrate discharge tunnels, installed in 1965 to supply cooling water to the conventional steam turbine units at ESGS (Units 3 and 4), were decommissioned in December 2015. Therefore, the proposed Project, which proposes the use of the existing tunnels, did not contemplate using the once-through-cooling water as diluent for the brine. In response to this and other comments expressing concern about the siting of the proposed Project and associated intake and discharge structures at the ESGS facility, West Basin reviewed publicly available data for other similar intake and outfall facilities within the Santa Monica Bay. This analysis compares the existing 316(b) data from the ESGS, the Scattergood Generating Station (SGS), and the Redondo Beach Generating Station (RBGS), and evaluates the differences in planktonic species' variation and densities, and the potential levels of entrainment that could result from a desalination plant at each location. Results of the analysis (see Final EIR Appendix 12) indicate that the preferable location for a project's ocean water intake in coastal California must be as distant as possible from rocky reef/hard substrate habitat, coastal lagoons and estuaries, and marine protected areas (MPAs) in order to minimize the entrainment of larval fish, including special status and managed fish and invertebrate taxa. Based on available data, the evidence indicates the ESGS is the "best available" site in SMB to minimize the intake and mortality of marine life. See *Master Response: Supplemental Studies*.

West Basin has chosen to utilize wedgewire screens because they are prescribed by the Ocean Plan Amendment where subsurface intakes are infeasible. As explained in the Draft EIR Sections 1.2, *Executive Summary*, and 3.3, *Project Description*, West Basin's goal is to ensure future water supply reliability for service area customers by adding a locally produced, drought-proof potable water source to the West Basin supply portfolio, consistent with goals for desalinated ocean water supplies identified in West Basin's 2015 Urban Water Management Plan (UWMP). Desalination as a component of West Basin's future water supply portfolio would offset up to 22,500 AFY³ of

³ Including 1,000 AFY of brackish groundwater desalination that could come from West Basin's existing C. Marvin Brewer Desalter facility.

imported water in order to “diversify West Basin's water source portfolio” and would allow West Basin to “increase reliability . . . while reducing reliance on imported water.” The EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that a project is likely to have on the environment. Comments on the appropriateness of the project size are not within the scope of CEQA. Nevertheless, these comments are included within the Administrative Record and will contribute to the information that will be considered by the decision-makers in the context of the entire record. See also response to comment LAW2-38, SCLA-3 and EOGB-23 and *Master Response: Water Supply Alternatives*.

Response MLBU-32

The Draft EIR does not extrapolate Local Project impacts to the Regional Project, nor is the Regional Project analysis tiered off the Local Project analysis as asserted by the commenter. As explained in the Draft EIR Section 5.0, *Approach to Analysis*, impacts associated with the Local Project are assessed at a project-level, whereas impacts associated with the Regional Project are assessed at a project-level for those components that are known (such as the physical size of the facility) and a programmatic-level for those aspects of the proposed Project that are not well-defined (such as regional partners). Every topical section in Section 5 (*Environmental Analysis*) distinguishes between the Local Project and the Regional Project when discussing and analyzing the potential impacts of each proposed Project component (i.e., Ocean Water Desalination Facility, Screened Ocean Intake and Concentrate Discharge, Desalinated Water Conveyance Components). The impacts resulting from the Regional Project are sometimes assessed in terms of the incremental increase against baseline potentially resulting from the additional build out and operation of the Regional Project, in addition to the impacts from the Local Project.

However, in the example cited by the comment (“As with the Local Project . . .”), the Draft EIR draws the conclusion it does about the Regional Project because that is what the evidence presents, not because of extrapolation or an incremental increase. In the paragraph prior to the text cited in the comment, the Draft EIR explains that Table 5.9-8 summarizes the minimum initial dilution ratios modeled for the proposed operational discharges for the Regional Project, and explains these dilution ratios *are almost identical* to those calculated for the Local Project although the volume of discharge would be greater. As such, the assessed concentrations of water quality constituents at the edge of the ZID (the point of compliance) for the Regional Project would be similar to those reported for the Local Project. Therefore, the Draft EIR correctly concludes that based on modeling of the Regional project against ambient ocean conditions, *as with the Local Project*, the brine discharge from the Regional Project would not contribute contaminants or increase their concentration significantly over ambient levels beyond the mixing area.

Response MLBU-33

In response to comments, some changes have been made to the EIR to clarify various issues. Also, in response to comments, additional studies were undertaken that merely amplify or clarify the data in the EIR and confirm its impact analyses; those studies also support future regulatory decisions to be made by other agencies. However, neither the methodologies employed nor the

conclusions reached have changed in any way that implicates a significant environmental impact not identified in the Draft EIR, a substantially more severe significant environmental effect than indicated, or a new feasible alternative or mitigation measure (CEQA Guidelines Section 15088.5). The questions raised by the commenter, and any revisions that have been made to the Draft EIR in response, are not significant in a way that would require recirculation of, or supplement to, the Draft EIR because they provide additional clarifications, and do not change any of the impact determinations, previously discussed in the Draft EIR. In addition, the Draft EIR is comprehensive and robust, compiled by scientists and experts in their respective environmental fields. West Basin as the lead agency under CEQA believes it complies with the requirements of CEQA and is supported with substantial evidence. For these reasons, recirculation of the Draft EIR is not required. The commenter's suggestion to consider reconfiguring the project is noted for the record. The commenter is also referred to *Master Response: Supplemental Studies*.

Response to Letter MBCH: City of Manhattan Beach

Response MBCH-1

West Basin initially provided a Draft EIR review and comment period of 60 days, from March 27, 2018, through May 25, 2018. In response to comments requesting an extension, West Basin granted a 31-day extension for review and comment on the Draft EIR, as requested by the commenter. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period.

Response to Letter MBCH2: City of Manhattan Beach

Response MBCH2-1

West Basin initially provided a Draft EIR review and comment period of 60 days, from March 27, 2018, through May 25, 2018. In response to comments requesting an extension, West Basin granted a 31-day extension for review and comment on the Draft EIR, as requested by the commenter. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period.

Response to Letter MBCH3: City of Manhattan Beach

Response MBCH3-1

In response to comments, some changes have been made to the EIR to clarify various issues. Also, in response to comments, additional studies were undertaken that merely amplify or clarify the data in the EIR and confirm its impact analyses; those studies also support future regulatory decisions to be made by other agencies. However, neither the methodologies employed nor the conclusions reached have changed in any way that implicates a significant environmental impact not identified in the Draft EIR, a substantially more severe significant environmental effect than indicated, or a new feasible alternative or mitigation measure (CEQA Guidelines Section 15088.5). The questions raised by the commenter, and any revisions that have been made to the Draft EIR in response, are not significant in a way that would require recirculation of, or supplement to, the Draft EIR because they provide additional clarifications and do not change any of the impact determinations previously discussed in the Draft EIR. In addition, the Draft EIR is comprehensive and robust, compiled by scientists and experts in their respective environmental fields. West Basin as the lead agency under CEQA believes it complies with the requirements of CEQA and is supported with substantial evidence. For these reasons, recirculation of the Draft EIR is not required.

Response MBCH3-2

West Basin has provided written responses to comments to commenting agencies in accordance with CEQA Guidelines Section 15088.

As explained in the Draft EIR Section 5.0, *Approach to Analysis*, impacts associated with the Local Project are assessed at a project-level, whereas impacts associated with the Regional Project are assessed at a project-level for those components that are known (such as the physical size of the facility) and a programmatic-level for those aspects of the proposed Project that are not well-defined (such as regional partners). The impacts resulting from the Regional Project are assessed in terms of the incremental increase against baseline, in addition to those impacts potentially resulting from the construction and operation of the described Local Project facilities.

The baseline conditions against which the potential direct and indirect impacts of the Project(s) (and alternatives) are assessed are based on the quality of environmental resources within the proposed Project area at the time of the issuance of the Notice of Preparation (NOP), as well as the existing regulatory framework relevant to construction and operation of the proposed Project. If substantial changes are proposed to the Project, or substantial changes in circumstance under which the project is being undertaken occur following certification of this Final EIR, or if new information which could not have been known at the time the EIR was certified becomes available, a subsequent or supplemental environmental review would be required (CEQA Section 21166).

The Local Project and Regional Project are described in an appropriate amount of detail and “stability” in the Draft EIR Section 3, *Project Description*. The Local Project components are described in the Draft EIR Subsection 3.4.1 and the Regional Project components are described in the Draft EIR Subsection 3.4.2. As stated in each section, respectively, the Local Project would

produce 20 MGD of product water, while the Regional Project would produce 60 MGD. The Local Project construction is described in the Draft EIR Section 3.5 while the Regional Project construction is described in the Draft EIR Section 3.6. Every topical section in Section 5 (*Environmental Analysis*) distinguishes between the Local Project and the Regional Project when discussing and analyzing the potential impacts of each proposed Project component (i.e., Ocean Water Desalination Facility, Screened Ocean Intake and Concentrate Discharge, Desalinated Water Conveyance Components).

The Local Project and the Regional Project are defined distinctly for several reasons. The primary reason is that the construction effort associated with each component would occur independently and at different times; the Local Project would be installed first, followed by the Regional Project if regional collaborators are secured. If, at a later date, the Regional Project becomes a reality, the analysis clearly defined and included in this EIR will be expanded upon, if necessary, to fully evaluate the construction and operation of the Regional Project. All of the analysis contained within each section of the EIR fully describes the impacts of implementing a series of facilities, which, comprised together, encompass the whole of the proposed Project.

Response MBCH3-3

The Draft EIR Subsection 5.16.4 describes potential impacts on the sewer systems. Industrial wastewater generated at the ocean water desalination facility would be conveyed to either the City of Los Angeles sewer system (El Segundo connection) or the Sanitation Districts of Los Angeles County sewer system (Manhattan Beach connection) depending on capacities, and West Basin would be required to obtain an Industrial Wastewater Discharge Permit to comply with the facilities' Wastewater Ordinances.

Response MBCH3-4

The routine use or accidental release of hazardous materials is evaluated in the Draft EIR Section 5.8, *Hazards and Hazardous Materials*.

Response MBCH3-5

The ESGS North Site is an approximate 8-acre area located in the middle of the ESGS property and the South Site is an approximate 13-acre area located in the southern portion of the property (see Draft EIR page 3-2). Since the Draft EIR Table 3-1 shows that the total footprint for the Local Project would be about 3 acres (138,000 or 133,600 square feet at the South or North Site, respectively), there would be ample acreage for a parking lot that the Draft EIR explains on page 3-10 would be a single-level structure located adjacent to the Joint (with NRG) Administrative/Operations building; it would be graded as such along with the site circulation roads (see Draft EIR page 3-19). Resulting impacts on aesthetics and biological resources (and all other topical sections) are addressed in the Draft EIR for the whole of the proposed Project footprint. Any traffic or circulation impacts resulting from any spillover parking would be managed within the fenced proposed Project site and would not impact public roads. The same parking structure would accommodate, and would not be impacted by, the Regional Project.

Response MBCH3-6

The Draft EIR text on page 3-11 has been revised to explain that the frequency of the bypass events for the Local Project is expected to be minimal, at several times a year for a duration of approximately one to 24 hours each. And the bypass events for the Regional Project (Draft EIR page 3-17) could occur several times per month for a duration of approximately one to 24 hours each. Since the discharges would “bypass the entire treatment facility”, the bypassed flows would therefore be comprised of seawater.

Response MBCH3-7

The Draft EIR Table 3-2 lists the desalination facility chemical storage capacities for the Local Project as well as for the Regional Project.

Response MBCH3-8

As described in the Draft EIR Subsection 3.4.2, a pump station would only be required for the Regional Project. EIR Section 2.2 explains that this EIR would provide the basis for any future project-level CEQA analysis for the incremental addition of the Regional Project (CEQA Guidelines Section 15168(d)) if it were to be pursued. Draft EIR Subsection 5.14.4 explains that the pump station sites would remove some areas of existing parks from public use, but once constructed would not substantially reduce the availability of recreational facilities in the community. Only small portions of the existing public space would be committed to the pump station. Installation of the pump station within an existing recreational facility, if necessary, would be consistent with goals to accommodate local water supply projects and would not significantly impact the use of the existing facilities and impacts would be less than significant.

In response to this comment, the Draft EIR text in Project Description Table 3-11 is revised (see Final EIR Section 11, *Refinements to the Project Description*) as follows:

L.A. County Parks

Encroachment Permit

May be required for siting, construction and operation of the Regional Project pump station.

Response MBCH3-9

A complete listing of all ocean intake/discharges in the Southern California Bight is not necessary to characterize the cumulative context within which the proposed Project would occur. Potential impacts of the proposed Project are evaluated against baseline conditions, which by definition includes the effects of existing projects. As defined in CEQA Guidelines Section 15355, a cumulative impact from multiple separate projects consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other closely related projects. CEQA Guidelines Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable, as defined in Section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” a lead agency need not consider that effect significant but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

The approach to each cumulative analysis varies for each environmental issue and is described at the end of each topical section in Section 5. In particular, the analysis of cumulative water quality impacts is focused on the pollutants associated with desalination operations, which consist primarily of increased salinity in discharged water and minor other incidental pollutants including copper resulting from corrosion of the wedgewire screens. The analysis of cumulative water quality impacts is provided in the Draft EIR on pages 5.9-78 to 5.9-80. As indicated on page 5.9-79, “cumulative discharges to the Santa Monica Bay include cooling water discharges from the operating units of the ESGS Site, the 5-mile ocean outfall from the City of Los Angeles Hyperion Water Reclamation Plant, the County of Los Angeles Joint Pollution Control Plant outfall off Palos Verdes, and numerous stormwater drainages along the coastline including major contribution from Ballona Creek.” The analysis goes on to indicate that, “the likelihood of discharge plumes from different outfalls ... intersecting or merging and resulting in exceedances of the California Ocean Plan defined water quality objectives or receiving water salinity limitations and adversely affecting beneficial uses of receiving waters (Santa Monica Bay) is very low.” Further the analysis indicates that “brine discharge from the operation of the proposed Project desalination plant would be subject to water quality limitations under a NPDES Permit for the discharge through the diffuser (Impact 5.9-2). Similarly, the operational discharges of projects considered in the cumulative scenario (Table 4-2) are subject to the water quality requirements of the NPDES permit system, administered by the LARWQCB. Mandatory water quality testing and analysis, required as part of the NPDES permit process, would ensure operational discharges comply with Basin Plan and California Ocean Plan water quality objectives and effluent limitations. The cumulative impact from the discharges to the Santa Monica Bay would be considered less than significant.” The contribution of the proposed Project and other similar projects that have regulated discharges would not be cumulatively considerable with unregulated discharges.

Response MBCH3-10

The Draft EIR evaluates potential impacts to scenic resources in Section 5.1. The Draft EIR notes on page 5.5-21 that power would be supplied by SCE and that additional power poles may be needed. As stated on page 5.5-21 of the Draft EIR, “[i]t is anticipated that the SCE electrical power grid may require upgrades to supply the Project operations. Upgrades *could include*, for example, new conductoring on existing power poles or *installation of new poles*. However, *SCE is unable to confirm the necessary upgrades to their power grid. As a result, subsequent evaluation of these upgrades may be required.*” [Emphasis added.] Potential new poles that may be required to enhance the power grid are not evaluated in the Draft EIR because they are speculative, but if they are required in the future, any potential impacts would be reviewed at that time.

Response MBCH3-11

Impacts to scenic vistas and scenic resources in a state scenic highway are discussed on pages 5.1-9 through 5.1-19 of the Draft EIR, and include consideration of visual simulations from four key view vantage points depicted in Figures 5.1-1 through 5.1-22 (presented on pages 5.1-32 through 5.1-67 along with descriptions of effects to each key view as a result of the Local Project and Regional Project at each of the potential locations – South Site and North Site). The analysis

of construction impacts does not rely on the temporary nature of construction impacts, rather the analysis is based on the totality of the circumstances as well as the mitigation measures. On page 5.1-10, the analysis indicates that “[c]onstruction activities at the ESGS South Site would be visible from the public coastal areas, Marvin Braude Coastal Bike Trail, 45th Street, and Vista Del Mar. The existing 45th Street berm would be retained and re-landscaped to minimize exposure to local land uses and public views. For the entire ESGS South Site construction period, construction views from 45th Street would be screened by use of temporary construction screening and the existing berm.” The analysis relies upon Mitigation Measures AES-1 through AES-4 that require screening of construction activities to the maximum extent practicable.

Response MBCH3-12

The mitigation measures are not deferred as they include performance standards. The dimension and material of screening will be determined when the equipment to be screened and the duration of necessary screening have been identified. As noted by the commenter, Mitigation Measure AES-1 requires that staging areas be screened to minimize public views to the maximum extent practicable. West Basin would be responsible for ensuring compliance with all mitigation measures. The basis for the benchmark is existing conditions. Mitigation measures would be implemented as needed to mitigate impacts. For example, AES-1 requires screening of staging areas, so prior to use of such areas, screening would be put in place.

Response MBCH3-13

West Basin is responsible for implementing all mitigation measures including ensuring that rooftop mechanical equipment is screened from view where possible. Screening of views will be based on the four key viewpoints evaluated in the Draft EIR that are representative of all potential views and vantage points. West Basin would evaluate and implement as appropriate additional screening as needed to ensure mechanical equipment is screened as much as possible. Nonetheless, the buildings will have some rooftop mechanical equipment similar to most light industrial buildings, and the impacts of these facilities to local views would be less than significant when thoughtfully designed and screened as required in the mitigation measure.

Response MBCH3-14

The mitigation measures commit the applicant to implementing feasible screening where possible. A screen is designed to shield potentially unattractive elements from view. Screens typically consist of fencing but can include vegetation. With respect to the proposed Project it is anticipated that most public views during construction will be screened by solid construction fencing that would block views of construction equipment from most public vantage points. Nonetheless, the buildings will have some rooftop mechanical equipment similar to most light industrial buildings, and the impacts of these facilities to local views would be less than significant when thoughtfully designed and screened as required in the mitigation measure.

Response MBCH3-15

The Draft EIR provides Key View 3 which is from 45th Street immediately adjacent to the South Site. As indicated on page 5.1-37, if constructed on the South Site, the proposed Project “would

be visible from the street level on 45th Street; refer to Figure 5.1-8. Existing views to the on-site surface parking lot (the former ESGS Tank Farm site) would be replaced with Local Project ocean water desalination facility structures, which would extend above the visible horizon.” The intent of CEQA is to evaluate potential impacts on the environment as a whole as compared to existing conditions. The view from 45th street adjacent to the South Site is from a relatively limited location experienced by most people very briefly in passing. The majority of the view that would be blocked from that limited location is of a parking lot, but a short segment of ocean view visible above the parking lot would also be blocked from the roadway. 45th street is not a main vehicle thoroughfare and does not have a sidewalk for pedestrian use for much of its length, therefore view impacts are considered less than significant with the mitigation measures (screening) identified in the Draft EIR.

Response MBCH3-16

The impact evaluation of operational impacts of the Regional Project is not based on historic uses. As noted on page 5.1-17, “[t]he industrial nature of the existing site and surrounding uses (north and east) provides context for the proposed Project, and in general the proposed Project is considered compatible with *existing* and historic uses on the site and expected to result in less than significant impacts to views with incorporation of mitigation measures.” [Emphasis added.]

Response MBCH3-17

The California Coastal Act does not indicate that a project cannot block any views of the coast. The California Coastal Act recognizes that there is a need for some coastal dependent industrial uses and provides policies that allow appropriate evaluation of such projects. As indicated on page 5.1-17, “... the expanded development proposed at the ESGS South Site is considered consistent with the LCP and Coastal Act since it would: (1) not block views of the scenic coastal areas, (2) minimize the alteration of natural land forms, (3) be visually compatible with the character of surrounding areas (north and east), and (4) include landscaping to enhance visual quality in visually degraded areas and to buffer the community to the south.” A detailed discussion of proposed Project consistency with the Coastal Act and the El Segundo Local Coastal Plan is provided in table 5.10-3 pages 5.10-17 through 5.10-20.

Response MBCH3-18

The proposed Project is not located within Manhattan Beach and therefore a detailed evaluation of consistency with Manhattan Beach General Plan policies is not appropriate. However, West Basin is sensitive to the needs of neighbors to the south in Manhattan Beach and intends to implement all feasible mitigation measures to reduce impacts on Manhattan Beach residents. As the commenter notes, relevant policies that apply to adjacent development in the City of Manhattan Beach are presented in the Draft EIR on page 5.1-3. Goal LU-4 indicates “[p]reserve the features of each community neighborhood, and develop solutions tailored to each neighborhood’s unique characteristics.” The proposed Project is consistent with the existing zoning on the proposed Project site. Policy 4.1 under that goal indicates that public access and enjoyment of the beach should be protected while respecting privacy of beach residents. The proposed Project does not affect access. While it does add an industrial use (to an industrially

zoned property) along the beach front, the proposed Project would not change the character of the site and would not substantially impact enjoyment of the beach.

Response MBCH3-19

As noted in footnote 1 in the Draft EIR on page 5.1-1, “the analysis addresses public views and not private views, since obstruction of private views is not generally regarded as a significant environmental impact.” The footnote goes on to highlight the courts’ position that a CEQA analysis, “must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general.” The Draft EIR evaluates impacts of the proposed Project on the environment. Impacts of the proposed Project on the South Site to visual character are evaluated in the Draft EIR on pages 5.1-20 through 5.1-22. Mitigation measures require screening that would reduce impacts by softening the southern border of the site with landscaping and screening mechanical equipment from view.

Response MBCH3-20

As explained in the Draft EIR on page 3-14, the Regional Project would be an expansion of the initial 20 MGD Local Project. In order to clearly present impacts and avoid repetition, the EIR describes impacts of the Local Project and then the added impacts of the Regional Project. The impacts of the Local Project and the impacts of the Regional Project are evaluated in comparison to the existing baseline.

Response MBCH3-21

The mitigation measures identified to address impacts to aesthetic resources generally require screening and rely on performance standards to achieve impact reduction. More screening would be required of the larger Regional Project, but the same performance standards would apply (e.g. minimizing public views of staging areas).

Response MBCH3-22

As noted in the Draft EIR on page 5.1-26, “[c]onstruction would generally not occur during the nighttime; however, security lighting would be required.” Therefore, the analysis of construction lighting impacts is based on the anticipated low-level security lighting. Further the analysis indicates, “[t]o ensure that light spillover onto adjacent property does not occur, compliance with Mitigation Measure AES-5 requires preparation of a Construction Safety Lighting Plan that demonstrates that all construction-related lighting is located and aimed away from adjacent residential and public beach areas and consists of the minimal wattage necessary to provide safety at the construction site.”

Mitigation Measure AES-6 for operational impacts is not deferred mitigation as it includes a performance standard to ensure that exterior lighting does not spill onto adjacent residential properties. The benchmark would be existing lighting levels. West Basin would evaluate proposed lighting to ensure that the proposed Project does not result in new spillover lighting on to adjacent residential properties. It is possible to shield lights such that no light spills on to adjacent properties.

The proposed Project site is located in the City of El Segundo. Pages 5.1-2 through 5.1-5 identify generally the most applicable regulations and policies. As noted on page 3-42 in footnote 1, “California Government Code Section 53091(d) states that ‘[b]uilding ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, wastewater, or electrical energy by a local agency.’ Furthermore, Section 53091(e) states that ‘[z]oning ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water . . .’ However, West Basin intends to make every effort to comply with all applicable building and zoning ordinances stipulated under the City of El Segundo Municipal Code in the construction and operation of the Ocean Water Desalination Project.” Mitigation Measure AES-7’s painting requirement would be consistent with these building and zoning ordinances.

West Basin is responsible for implementing the mitigation measures identified in the EIR and would determine the appropriate implementation actions to meet the identified performance standards based on professional judgement.

Response MBCH3-23

A discussion of General Conformity is addressed in the Draft EIR starting on page 5.2-25 in the *Federal Conformity Analysis for SRF (CEQA Plus)* section. Because the proposed Project exceeds the *de minimis* threshold for NO_x, West Basin performed a general conformity analysis. Pursuant to 40 C.F.R. section 93.158 *Criteria for determining conformity of general Federal actions*, “where the action involves regional water and/or wastewater projects” exceeding limits for ozone or nitrogen dioxide, such action is determined to conform to the applicable state implementation plan (SIP) if the project is “sized to meet only the needs of population projections that are in the applicable SIP. See 40 C.F.R. Section 93.158(a)(5)(v). As discussed in the last full paragraph on page 5.2-28 of the Draft EIR, the proposed Project meets the conformance criteria under 40 C.F.R. section 93.158(a)(5)(v) because it is a regional water project that is sized to replace approximately 10 percent of the imported water supplies to meet existing demand and population projections included in the SIP. The proposed Project replaces existing water supply; it does not create new water supply capacity. Such replacement water would help to meet existing and future water demands outlined in the 2015 UWMP, thereby reducing the District’s imported water dependency. The water demands identified in the UWMP are based on the applicable SCAG Regional Transportation Plan /Sustainable Communities Strategy (RTP/SCS) population and water demand projections that are specifically developed to conform to the South Coast Air Basin’s SIP for NO_x. Therefore, the proposed Project conforms with the SIP population assumptions and meets the criteria for conformance applied to regional water supply projects.

Response MBCH3-24

Mitigation Measure AQ-3 requires that contractors provide proof of the use of Tier 4 engines. West Basin would be responsible for ensuring compliance with the mitigation measure. As a public agency, records of compliance will be maintained for public scrutiny, but no public participation in compliance enforcement would be initiated or needed.

Response MBCH3-25

In order to identify impacts to nearby sensitive receptors, the SCAQMD recommends using its Localized Significance Thresholds (LSTs). Based on the size of a project and the distance to receptors, if its daily emissions are under this screening level, it would not have the potential to exceed federal or state Ambient Air Quality Standards (AAQS). If, as shown in Table 5.2-18 for NO_x from the offshore emissions, a project's daily emissions exceed the LSTs, there is the potential for the project to exceed the AAQS and a refined analysis must be conducted to determine if impacts to sensitive receptors is significant. The refined analysis is an additional level of analysis between the LSTs and dispersion modeling that takes into account more project-specific information to provide a more accurate account of emissions from a project. These pollutant concentrations are then compared to the most stringent AAQS for that pollutant. Pollutant concentrations that do not exceed the AAQS are determined to be less than significant for impacts to sensitive receptors. The "refined analysis for Offshore Emissions" row in Table 5.2-18 provides the results of the additional analysis performed for NO_x emissions and, as shown, demonstrates that while the proposed Project exceeds the LSTs, when a more project-specific analysis is conducted, the proposed Project would not exceed the AAQS. In response to the comment requesting clarification of the Local Project's offshore emissions related to NO_x shown in Table 5.2-18, the Draft EIR text is modified as presented below.

The Draft EIR text on page 5.2-20 is revised as follows:

... For sites over 5 acres, if the emissions exceed the screening level thresholds in the lookup tables the site would have the potential to result in significant local impacts and the SCAQMD recommends air quality dispersion modeling to assess impacts to nearby sensitive receptors. This refined analysis uses the AERMOD dispersion model to determine the concentration of the pollutant at the nearby receptor locations. For NO_x and CO emissions, concentrations derived from the dispersion modeling are converted to ppm, added to the existing background emissions, and compared to the appropriate ambient air quality standards shown in Table 5.2-1. For PM₁₀ and PM_{2.5}, concentrations are compared to an increase of 10.4 µg/m³.

The Draft EIR text on page 5.2-46 is revised as follows:

... It is noted that due to the location of the Project components, LST emissions associated with the construction of the onshore facilities for the ESGs were evaluated for a 5-acre site at 25 meters. Construction of offshore Project components were evaluated for a 5-acre site at 500 meters. Construction of the off-site conveyance pipeline ~~was~~ ~~were~~ evaluated for a 1-acre site at 25 meters. Where emissions exceed the screening tables, a refined analysis was conducted to determine the potential to result in significant impacts as discussed in Section 5.2.3 Significance Thresholds and Criteria – Localized Significance Thresholds.

The following footnote is added with respect to the refined analysis of offshore emissions to Table 5.2-18 on page 5.2-47 as follows:

Refined analysis for Offshore Emissions²

²The refined analysis utilized dispersion modeling. Because the Basin is in non-attainment for NO_x, the threshold is based on California ambient air quality standards as identified in Table 5.2-1.

The Draft EIR text on page 5.2-47 is revised as follows:

As identified in Table 5.2-18, incorporation of Mitigation Measures AQ-1 through AQ-3 for Local Project emissions for the screened ocean intake and concentration discharge facilities would result in less than significant impacts. Mitigated NOx emissions exceeds the LST screening tables for a 5-acre site at 500 meters. Therefore, a refined analysis was conducted to determine if the Project concentrations would exceed CAAQS for the specific Project conditions. Based on the results of the dispersion model, the impacts from the Project for the offshore emissions would not exceed the CAAQS and, therefore, the Project would result in less than significant impacts with respect to NOx emissions.

Response MBCH3-26

The quantitative analysis of the health risk assessment and emissions modeling is summarized in the body of the Draft EIR and detailed assumptions and calculations used in the analysis are included in Draft EIR Appendix 3D. In response to the comment, Section 5.2 Air Quality, particularly related to the health risk discussion, is updated to direct the reader to the appropriate appendix sections for technical data, including the risk calculations. As detailed in Appendix 3D, emissions reductions afforded by the incorporation of Mitigation Measures MM AQ-1 through MM AQ-3 were accounted for in the mitigated health risk calculations which results in the less than significant finding.

The Draft EIR text on page 5.2-48 is revised as follows:

...The resulting health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance. The spreadsheet tool incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance, and incorporates the results of the AERMOD dispersion model. Risk assumptions and calculations for both unmitigated and mitigated scenarios are included in Appendix 3D, Air Quality/Greenhouse Gas Emissions Data, Health Risk Assessment.

The Draft EIR text on page 5.2-53 is revised as follows:

...Construction of the Regional Project would contribute to the long-term emissions associated with the Project and would therefore add to the cumulative emissions experienced during the lifetime of nearby residents. Risk assumptions and calculations for both unmitigated and mitigated scenarios are included in Appendix 3D, Air Quality/Greenhouse Gas Emissions Data, Health Risk Assessment.

Response MBCH3-27

The first paragraph on Draft EIR page 5.2-56 states: "Construction in the immediate vicinity of 45th Street would also be of relatively short duration, and odors would be typical of construction and grading projects, and regulated by the ARB and SCAQMD." The analysis does not suggest that the construction period for the entire proposed Project is of relatively short duration, rather that the portion of time where construction equipment would be in the immediate vicinity of the residents would be of a relatively short duration. As outlined in Table 3-9 and described on page 3-32 installation of pipeline generally proceeds at 150 feet per day. Construction activities in front of a specific property would occur for three to four weeks.

The residents along 45th street are within approximately 100 feet and up to 1,200 feet from construction activities that would occur on the South Site, with the majority of construction occurring within 800 feet of these receptors. Construction equipment is not a stationary source and, therefore, would not be emitting diesel exhaust along the property line adjacent to the 45th street residents for the full duration of a construction day. Also, as shown in Project Description Figure 3-10, construction activities on the South Site are anticipated to be 50 or more feet in from the property line closest to 45th street, and not occurring along the fence-line. Activities that could occur along the proposed Project site boundary would be materials stockpiling during construction and would not include ground disturbing activities or large earth moving equipment. Additionally, the 100 feet measures the distance from the proposed Project site boundary to the property line and not to the actual residences farther away. As such, the distance from the source of emissions to the receptors would typically be greater than 100 or even 200 feet from where the residential sensitive receptors would be. During the times when the heaviest equipment is anticipated to be onsite, typically during demolition and grading activities, the equipment would be working over a large section of the site throughout the day and, therefore, emissions are not concentrated at the property fence-line.

Furthermore, the proposed Project is subject to SCAQMD Rule 402 which states "... a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public..." This would include odor as a nuisance. Because the project must comply with Rule 402, the potential for objectionable odors to affect residents is minimized. In sum, while during construction nearby residences may occasionally be affected by odor, given the distance and limited duration of construction activity, these impacts are considered to be less than significant.

Response MBCH3-28

As discussed in Draft EIR Subsection 5.3.2, a site survey of the proposed Ocean Water Desalination Facility was conducted on November 2, 2015 for biological resources. For the proposed pipeline alignments and regional pump station, the Draft EIR found that installation would occur within disturbed areas or within existing rights-of-ways, and that as such no impact to sensitive biological resources would occur. Tree removals are not anticipated along pipeline alignment. The Draft EIR concludes that indirect impacts to nesting birds in ornamental landscaping would be minimal due to existing human activity and disturbances in the urban landscape within city streets. No mitigation is required. The reason why cultural surveys were conducted along the alignments as the commenters references is that a disturbed landscape does not indicate a lack of cultural resources, which can be historic in nature and depend on the year built. That is why cultural surveys were done in this particular case.

Response MBCH3-29

As disclosed on page 5.3-15, the biological resources survey was conducted in November 2015, outside the nesting bird season. However, the Draft EIR recognizes that nesting and roosting opportunities on the ESGS site exist. To account for the possibility of nesting or roosting birds within the construction zone and adjacent areas, Mitigation Measure BIO-5 requires that a

qualified biologist conduct nesting bird surveys prior to any construction activities occurring within the nesting bird season, and includes detailed performance standards to ensure impacts are reduced to a less than significant level.

Response MBCH3-30

Even though coast buckwheat is the host plant for the El Segundo blue butterfly, it does not currently meet the definition of a special-status species (see Draft EIR Subsection 5.3.2, page 5.3-11). It should be noted that the coast buckwheat was artificially planted as part of ESGS improvements. Nevertheless, although the site visit was conducted outside the blooming period for many of the plants listed in Table 5.3-1, the survey concluded that the habitat was of sufficient quality to support the El Segundo blue butterfly based on an analysis of the quantity and extent of on-site habitat, the presence of the El Segundo blue butterfly in nearby areas, and the degree of urbanization in the area. Pre-construction surveys required in Mitigation Measure BIO-9 would be conducted to determine presence of listed plant and wildlife species that may have occupied the site in the intervening years between the initial surveys and construction.

Response MBCH3-31

In response to the commenter's suggestion to include performance standards within Mitigation Measure BIO-2, the Draft EIR text on page 5.3-36 is revised as shown in response to comment CEC-3.

Response MBCH3-32

In response to the commenter's suggestion about implementing measures within a close temporal timeframe to construction, Mitigation Measure BIO-6 has been revised as follows:

BIO-6: ~~Prior to~~ Within 72 hours of the commencement of ground-disturbing activities, a qualified biologist shall conduct a pre-construction clearance survey for western snowy plover on and in the vicinity of the ~~Project~~ ESGS-site. This shall include a focused search for western snowy plover in suitable habitat within 500 feet of proposed construction activities. Western snowy plover shall be avoided by workers waiting for western snowy plover to leave an area before working in it. If western snowy plovers are observed nesting within 500 feet of construction activities, a minimum buffer of 500 feet shall be delineated around the nest and monitored until the nest is no longer considered active.

Response MBCH3-33

A list of projects analyzed for cumulative impacts can be found in Table 4-1. As discussed in Draft EIR Subsection 5.3.5, all proposed Project impacts would be mitigated to less than significant levels and the Project's contribution toward cumulative impacts is not considered to be cumulatively considerable. This includes cumulative impacts to the western snowy plover.

Response MBCH3-34

Buildings associated with resources P-19-188895 (Hawthorne High School) and P-19-189423 (apartment building) are located more than 25 feet away from the proposed water conveyance pipeline alignments which would be installed using excavators and paving equipment. As

indicated in Chapter 5.12 Noise on page 5.12-26, ground-borne vibrations associated with the proposed water conveyance pipeline alignments would not be above levels that could damage structures at a distance of 25 feet from the source of vibration.

Resource P-19-190098 (El Segundo Generating Station) has been evaluated and found to not qualify as a historical resource pursuant to CEQA. Therefore, any project-related ground-borne vibrations at the El Segundo Generating Station are not considered a significant impact on a cultural resource.

Response MBCH3-35

Mitigation Measure CUL-3 has been revised to specify both onshore and offshore components shall be monitored and specific monitoring methodology for offshore components has been included. See response to comment SLC-14 to see these changes to the measure.

Response MBCH3-36

The preparation of the CRMMP is not a deferral of mitigation; rather it sets forward performance standards for cultural resources monitoring which necessarily would occur in the future. Mitigation Measure CUL-3 has been revised as follows and use of the word “mitigation” in reference to inadvertent discoveries has been replaced with the term “treatment” to avoid being conflated with the mitigation measures outlined in the EIR. Mitigation Measure CUL-3 has been revised to include greater specificity regarding the treatment of inadvertent discoveries. Mitigation Measure CUL-3 has also been revised to specifically include both onshore and offshore components. See response to comment SLC-14 to see these changes to the measure.

Response MBCH3-37

Mitigation Measure CUL-4 has been revised and use of the word “mitigation” in reference to inadvertent discoveries has been replaced with the term “treatment” to avoid being conflated with the mitigation measures outlined in the EIR. Mitigation Measure CUL-4 has been revised to reference Mitigation Measure CUL-3, which includes treatment for inadvertent discoveries. See also responses to comments SLC-15 and MBCH3-36.

Response MBCH3-38

Mitigation Measure CUL-5 has been revised as follows to include a provision that any confidential information pertaining to cultural resources will not be publicly disseminated.

CUL-5: Within 90 days after completion of ground-disturbing activities, West Basin shall prepare a CRR that specifies all field activities including dates, times and locations, findings, samplings and analysis. All survey reports, DPR 523 forms, and additional research reports not previously submitted to the CHRIS shall be included as an appendix to the CRR. All confidential information protected by relevant law and pertaining to cultural resources identified during monitoring shall remain confidential and will not be publicly disseminated.

Response MBCH3-39

The preparation of the PRMMP is not a deferral of mitigation; rather it sets forward performance standards for paleontological resources monitoring which necessarily would occur in the future. Mitigation Measure CUL-8 has been revised to include details as to what the PRMMP will include. See response to comment SLC-16 to see these changes to the measure. See also response to comment SLC-18.

Response MBCH3-40

As stated in the Draft EIR on page 5.4-26, fossil specimens have been identified in the vicinity of the proposed Project within Older Alluvium (Qoa) and Elevated Alluvial sediments (Qae) starting at depths of 13 feet below ground surface. Based on this research, it is assumed that the potential to encounter paleontological resources within these deposits is high at approximately 13 feet below ground surface. Given that the depths of these deposits are likely not uniform and fluctuate somewhat, monitoring will start at 10 feet to provide a buffer. Mitigation Measure CUL-10 has been revised as follows to clarify that paleontological resources monitoring will begin at 10 feet deep. The mitigation measure also clarifies inadvertent discovery protocol of a paleontological resource at a depth of less than 10 feet when a paleontological monitor is not present.

CUL-10: West Basin shall ensure that the PRMs monitor all construction-related grading, excavation, trenching, and boring in areas that involve excavations greater than 810 feet and extend into older Quaternary alluvial deposits, ~~both~~ at the desalination facility site, ~~and~~ desalinated water conveyance pipeline alignment, and offshore Project components. In the event that the Qualified Paleontologist determines full-time monitoring is not necessary in locations that were identified as potentially fossil-bearing in the PRMMP, monitoring activities may be modified, at the direction of the Qualified Paleontologist.

West Basin shall ensure that the Qualified Paleontologist and PRMs have the authority to stop or redirect construction if a unique paleontological resource or site or unique geologic feature is encountered. Should a paleontological resource be identified at a depth of less than 10 feet and a PRM or the Qualified Paleontologist is not present, all construction shall halt and the Qualified Paleontologist shall be contacted to assess the discovery and develop appropriate treatment in coordination with West Basin.

West Basin shall ensure that the Qualified Paleontologist prepares a summary of monitoring and other paleontological activities that will be reported on monthly. The summary will include the name(s) of the Qualified Paleontologist or PRMs active during the month, general descriptions of training and monitored construction activities, and general locations of excavations, grading, and other activities. A section of the report shall include the geologic units or subunits encountered, descriptions of samplings within each unit, and a list of identified fossils. A final section of the report shall address any issues or concerns about the Project relating to paleontological monitoring, including any incidents of noncompliance or any changes to the monitoring plan.

Response MBCH3-41

In response to the comment that asks for clarification on the “on-site solar power generation,” the Draft EIR text on page 5.5-15 is revised as follows:

West Basin is committed to pursuing reasonable and feasible energy minimization and efficiency as part of the Project, including use of energy recovery devices (for the first pass reverse osmosis [RO] process) and energy efficient pumps. In implementing Mitigation Measure GHG-1, West Basin may ~~will~~ also use on-site solar power generation to reduce load demand from the grid.

Response MBCH3-42

The statement on page 5.5-16 of the Draft EIR is included in the impact analysis portion of the section and is presenting ways in which the proposed Project's energy use is reduced with implementation of anti-idling regulations as compared to existing conditions. This discussion is based on the fact that construction activities associated with the Project would occur on top of the environmental baseline (existing conditions). The commenter is correct that if the proposed Project would not occur and the baseline conditions were maintained, use of energy efficient vehicles would not result in energy savings. However, the impact analysis is intended to demonstrate which potential impacts could occur if a project is implemented, and discuss ways those impacts can be mitigated, if possible. In this case, the EIR is stating that with anti-idling regulations, impacts resulting from implementation of the Project would be reduced compared to existing conditions.

Response MBCH3-43

The Draft EIR identifies the energy requirements of the proposed Project and evaluates whether the use of energy would be wasteful in Section 5.5. West Basin acknowledges that ocean water desalination is a more energy-intensive source than imported water but increases water supply stability and reliability for the overall regional water supply portfolio. The addition of ocean water desalination as a component of a diverse water supply portfolio is not a wasteful use of energy, since it represents a thoughtful balance of costs and risks aimed at benefiting the public and stabilizing availability and pricing of a vital public utility. Furthermore, the proposed Project would utilize state of the art technology to maximize efficiency.

Comparing the amount of energy to the overall County consumption provides a meaningful assessment of energy availability, and assists in determining whether the proposed Project would exceed the available electricity supply or require the construction of new or expansion of existing facilities. As shown, in Draft EIR Table 5.7-1, the energy intensity of MWD imported water ranges from 2,451 to 3,163 kWh/acre-feet. The estimated energy intensity of the Project as shown in Tables 5.5-5 and 5.5-6 is estimated at 4,867 kWh/acre-feet for the Local Project (20 MGD) and 5,215 kWh/acre-feet for the Regional Project (60 MGD), which is similar to the 5,086 kWh/acre-feet (15.6 kWh/kgal) estimate for the recently approved desalination project at South Coast Water District's Doheny Ocean Desalination Project (South Coast Water District 2018).

Another way of comparing the scale of the proposed project's energy use would be against West Basin's existing imported water energy use. As of 2015, West Basin imports 105,000 AFY that results in the use of approximately 294,735 mwh/y (2,807 kwh/AF x 105,000 AFY) by MWD. The proposed project would produce 21,500 AFY using 104,641 mwh/y (4,867 kwh/AF x 21,500 AFY). The proposed project represents 35 percent of the current total amount of energy expended to provide imported water supplies to the West Basin service area. The total energy use associated

with providing the same volume of water (21,500 AFY desalinated water and 83,500 AFY imported water) to the service area would increase from 294,735 mwh/y to 339,025 mwh/y, an increase of approximately 15 percent.

Regarding the commenter's statement that there are less energy intensive alternatives than ocean desalination for increasing local water supplies, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MBCH3-44

CEQA Guidelines Appendix F, Energy Conservation, states that the evaluation of energy use should be evaluated in an EIR and provides guidance for consideration in this evaluation. In accordance with Appendix F of the CEQA Guidelines, and as described in the Draft EIR in Section 5.5.3, the Project would result in a significant impact with regard to energy if the Project would, among other things, cause wasteful, inefficient, and unnecessary consumption of energy during construction, operation, and/or maintenance. These guidelines also state that in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)).

Under Impact 5.5-3, the Draft EIR references Table 5.5-4 only to illustrate that daily operation of the proposed Project would account for the majority of its demand for electricity. Impact 5.5-3 concludes that the proposed Project buildings would not result in inefficient, wasteful, or unnecessary consumption of energy, as they would be built to be highly energy efficient in accordance with California's Building Energy Efficiency Standards (Title 24, Part 6) as well as applicable requirements in CalGreen (Title 24, Part 11). Additionally, the proposed Project would not result in any unusual characteristics that would result in excessive operational fuel consumption, and fuel consumption associated with Project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. The Project would adhere to all applicable state and federal energy efficiency standards, and it would incorporate all available feasible energy recovery and conservation technologies to minimize the Project's energy electricity consumption, as required by Mitigation Measure GHG-1.

Regarding the commenter's statement that there are less energy intensive alternatives than ocean desalination for increasing local water supplies, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MBCH3-45

The Draft EIR concludes on pages 5.5-20 and 5.5-21 that the expected increase in demand for electricity does not exceed available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

As noted in the Draft EIR on page 5.5-21, it is anticipated that the SCE electrical power grid may require upgrades to supply the proposed Project operations. West Basin would ensure that relevant connection/expansion fees are paid to SCE in order to upgrade the existing SCE electrical grid such that it can adequately support proposed Project operations alongside the existing energy demands of the El Segundo Generating Station. Upgrades could include, for example, new conductoring on existing power poles or installation of new poles. However, SCE was unable to confirm the necessary upgrades to their power grid at time of writing.

The Draft EIR on page 5.5-21 describes the electrical substation that would be required on the property to lower the voltage from service voltage to site distribution voltage. The substation would be located at the proposed Project site, as shown in the Draft EIR in Figures 3-9 (ESGS North Site) and 3-10 (ESGS South Site). The impacts associated with construction and operation of that substation, are analyzed throughout the Draft EIR along with impacts of the overall Project.

While upgrades to SCE's power grid may be needed, SCE is unable to confirm what those necessary upgrades would be. As such, predicting and analyzing the impacts of these upgrades would be speculative. However, West Basin assumes that the upgrades would be relatively minor, involving the construction of a few additional poles or modifying conductoring that would result in less than significant impacts. Large scale infrastructure implementation such as the construction of a large off-site substation, power generating facility, or long-range conveyance system is not anticipated. West Basin has committed to paying all applicable connection/expansion fees to SCE. SCE would be required to implement any necessary mitigation measures and comply with all applicable laws and regulations in implementing the upgrades.

The Draft EIR acknowledges that the operation of the Local Project and the Regional Project would result in a less than significant impact from GHG emissions with the implementation of Mitigation Measure GHG-1, which requires the preparation and implementation of an Energy Minimization and GHG Reduction Plan. The discussion under Impact 5.5-3 correctly acknowledges that Mitigation Measure GHG-1 will reduce operational energy consumption through the use of available feasible energy recovery and conservation technologies, and thus prevent the proposed Project's wasteful, inefficient, and unnecessary consumption of energy.

Response MBCH3-46

The basis for using SCE's entire service area as a geographic context for the cumulative impact analysis is that SCE is the anticipated electrical service provider for the proposed Project. Furthermore, the cumulative impacts analysis assesses SCE's capacity planning for the Western Los Angeles Basin of the Los Angeles Basin local reliability area (see Draft EIR page 5.5-24). This is an appropriate level of detail given the manner in which SCE distributes electricity within its service area. The Draft EIR provides an overview of SCE's broad infrastructure and capacity, as well as the more local system. The Draft EIR concludes that the Project's additional demand is within the CPUC-approved future capacity authorizations for the Los Angeles Basin subarea. This is relevant and appropriate to include in the EIR.

The EIR complies with the requirements of CEQA in explaining that the proposed Project is not a wasteful use of energy since it represents a thoughtful balance of costs and risks aimed at benefiting the public and stabilizing availability and pricing of a vital public utility. Furthermore, the proposed Project would utilize state of the art technology to maximize efficiency. See also response to comment MBCH3-43.

Response MBCH3-47

Lateral spreading is discussed in the Draft EIR Subsection 5.6.2 on page 5.6-12. The surface and shallow subsurface geologic condition beneath the proposed Desalination Facility, Screened Ocean Intake, and Concentrate Discharge Site provides a low potential for lateral spreading as discussed in the Final Engineering Geology Report for the redevelopment of ESGs Units 5 through 8 (Ninyo & Moore 2013). While the potential for lateral spreading at the proposed Desalinated Water Conveyance Corridors, and Regional Pump Station Optional Site is unknown at this time, given the lack of a free face, the relatively flat topography, and low liquefaction potential east of the shoreline, the potential for lateral spreading is also considered low. In addition, as explained in Impact GEO 5.6-1 in the Draft EIR on page 5.6-16, the CBC and local ordinances require that the structural elements of the proposed Project undergo appropriate design-level geotechnical investigations and evaluations prior to final design and construction. The geotechnical investigation and evaluation would include any recommendations for soils remediation and/or foundation systems necessary to reduce seismic-related hazards to less than significant. Compliance with the existing regulations would ensure that persons and structures associated with the Local Project ocean water desalination facility would not be exposed to potential substantial adverse effects involving strong seismic ground shaking and seismic-related ground failure (liquefaction, lateral spreading, and landslides). With compliance with existing regulations and conditions, the impact would be less than significant.

Response MBCH3-48

The Draft EIR did not fail to establish an adequate baseline. As noted by the California Office of Planning and Research (OPR) “the focus of the analysis should not be on the ‘conflict’ with the plan, but instead, on any adverse environmental impact that might result from a conflict. For example, destruction of habitat that results from development in conflict with a habitat conservation plan might lead to a significant environmental impact. The focus, however, should be on the impact on the environment, not on the conflict with the plan.” (OPR 2017, page 35).

The Draft EIR acknowledges on page 5.10-22 that an LCP amendment would be needed to change the use from power generation to water production. Both uses provide a coastal-dependent public utility service that do not increase local coastal hazards compared with existing conditions. See also response to comment MBCH3-49.

Response MBCH3-49

The effects associated with coastal flooding and tsunami impacts, including sea level rise, are discussed in Draft EIR, Section 5.9, *Hydrology and Water Quality*, Impact 5.9-6 on pages 5.9-72 through 5.9-78.

As explained on page 5.9-72, sea level rise is an existing environmental condition, and unless the proposed Project will exacerbate this condition, it is not considered a potentially significant impact under CEQA. However, in the interest of providing as much information as possible, West Basin conducted a site-specific Coastal Hazards Analysis for the proposed desalination facility at the ESGS North and South Sites, a copy of which is provided as Draft EIR Appendix 5. In response to this and other comments, however, West Basin also prepared a Supplemental Coastal Hazards study (see *Master Response: Supplemental Studies*) that considered a high-risk sea level rise projection and the “extreme risk aversion” scenario known as the “H++” scenario. Furthermore, Mitigation Measure HYDRO-1 in EIR Subsection 5.9.4, requires the District to complete a Project-specific coastal engineering study for the final Project design, and requires the final Project engineering design to minimize conflicts with the applicable Coastal Act Section 30235 (Construction altering natural shoreline) and Section 30253 (Safety, stability, pollution, energy conservation, visitors). See also response to comment CCC-19.

Response MBCH3-50

The Draft EIR did not find all construction-related impacts to be less than significant; see Draft EIR Subsection 7.1.3. Construction-related impacts associated with Air Emissions and Noise were found to be significant and unavoidable.

With respect to the impact of seismic damage, as discussed in Subsection 5.6.3, CEQA generally does not require a lead agency to consider the impact of the existing environment on the project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment. There is no indication that the construction or operation of the proposed Project would exacerbate the exposure of people or structures to seismic hazards. The possibility of moderate to high seismic activity may be considered as approximately similar to the entire Southern California region as a whole. Nevertheless, the Draft EIR recognizes that seismic damage during construction would result in a delay in the completion of the proposed Project, and some unfinished and/or damaged project components may have to be rebuilt. Such delays would be temporary and therefore, the potential for the proposed Project to be exposed to the adverse effects of seismic hazards, including the risk of loss, injury, or death involving a seismic event during construction would be less than significant. See Draft EIR Subsection 5.6.4. No further analysis is required.

Response MBCH3-51

Expansive soils are discussed in the Draft EIR Subsection 5.6.2 on page 5.6-13. Expansive soils are clayey soils that have the potential to shrink and swell and damage structures. However, the surface and shallow subsurface geologic conditions beneath the proposed Project components are sandy and would not be susceptible to expansion, as evidenced by the lack of structural damage to the existing on-site NRG Units 3 and 4 structures. This is not a vacant property with unknown soil characteristics. In addition, as explained in Impact GEO 5.6-4 on page 5.6-24, the CBC and local ordinances require that the structural elements of the proposed Project undergo appropriate design-level geotechnical investigations and evaluations prior to final design and construction. The geotechnical investigation and evaluation would include any recommendations for soils remediation and/or foundation systems necessary to reduce hazards from soil conditions. Compliance with the existing regulations would ensure that persons and structures associated

with the Local Project ocean water desalination facility would not be exposed to potential substantial adverse effects involving expansive soils. With compliance with existing regulations and conditions, the impact would be less than significant.

Response MBCH3-52

Starting on page 5.7-19, Draft EIR explains that the threshold of significance used in this document is net carbon neutral; i.e., the Project would have a significant impact on GHG emissions if it were to increase emissions above net carbon neutral as compared to emissions associated with continuing to import water. To the extent GHG emissions resulting from the Project exceed this net carbon neutral standard, West Basin has committed to Project design features and mitigation measures that will offset 100 percent of these excess emissions so that impacts are less than significant. Also see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MBCH3-53

The Project's operational GHG emissions, as shown in Table 5.7-3, represent average annual electricity consumption needed to operate the desalination facility, based on the report *Energy Consumption for West Basin Ocean Water Desalination Project EIR* (SPI 2017), and the most recent emission factor (2016) publicly reported by SCE.

Response MBCH3-54

Regarding the commenter's concern over use of a net carbon neutral goal as an emissions threshold rather than a numeric one, please see *Master Response: Greenhouse Gas Emissions and Energy Use*.

Response MBCH3-55

The estimate for the Regional Project's average annual GHG emissions included in the Draft EIR Section 5.7.4 is based on the amortized total construction emissions plus annual emissions that result from operational electricity use, as presented and explained in Table 5.7-4 (Draft EIR page 5.7-27); the Draft EIR does not assume a linear increase in GHG emissions from the Local Project.

Response MBCH3-56

Mitigation Measure GHG-1 requires that West Basin offset emissions to the net carbon neutral quantities, i.e., no increase from current levels of emissions needed to deliver water to West Basin customers. Table 5.7-3 provides a calculation of the GHG offset quantities envisioned by the measure for the Local Project. This quantity estimate will vary depending on the verified emissions calculations prepared in compliance with Mitigation Measure GHG-2. The preparation and implementation of the Energy Minimization and GHG Reduction Plan required by Mitigation Measure GHG-1 can include some or all of the mitigation options identified in subsection 3, as needed to achieve required energy reductions; any or all of them represent a viable means to directly reduce or offset GHG emissions associated with the Project. However, the measure requires West Basin to minimize the proposed Project's energy demand and implement on-site

renewable energy use before progressing through the remainder of the mitigation options identified in subsection 3 of Mitigation Measure GHG-1 (renewable power purchase agreement, renewable energy certificates, and carbon offsets) on the basis of the options' physical and economic feasibility. Without knowing the required reductions to achieve the GHG threshold, along with current information on cost-effectiveness, regulatory feasibility, technological feasibility, and availability of each option, it would be speculative to quantify the emissions reductions from each of the mitigation options at this time.

Mitigation Measure GHG-2 requires that West Basin prepare and publish an annual GHG Report to quantify annual GHG emissions resulting from proposed Project operation and the annual GHG emissions avoided by not using imported water sources. The sum of the GHG emissions from Project operation and the amortized construction emissions minus the avoided GHG emissions from not using imported water would be used to determine the annual incremental GHG emissions that must be mitigated by the proposed Project.

Response MBCH3-57

Mitigation Measure GHG-1 requires the preparation of an Energy Minimization and GHG Reduction Plan, while Mitigation Measure GHG-2 describes how the annual monitoring of the Plan will work. As the Draft EIR describes on page 5.7-32, Mitigation Measure GHG-2 requires West Basin to prepare and publish an annual GHG Report quantifying annual emissions and demonstrating how the Project is meeting its obligation to reduce GHG emissions to a net carbon neutral threshold of significance. The findings of the annual report are to be validated and verified by a third-party accredited entity under a state-recognized standard, such as ISO 14065, which specifies principles and requirements for validation or verification of GHG accounting, or a similar standard. In addition, compliance with the offset is required through West Basin's commitment to implementing the Mitigation Monitoring and Reporting Plan.

Response MBCH3-58

As the Draft EIR describes on page 5.7-32, Mitigation Measure GHG-2 requires West Basin to prepare and publish an annual GHG Report quantifying annual emissions and demonstrating how the Project is meeting its obligation to reduce GHG emissions to a net carbon neutral threshold of significance. The findings of the annual report are to be validated and verified by a third-party accredited entity under a state-recognized standard, such as ISO 14065, which specifies principles and requirements for validation or verification of GHG accounting, or a similar standard.

In response to the comment, revisions have been made to Mitigation Measure GHG-1 to further clarify that the mitigation reduces impacts. In response to the comment, the Draft EIR text on page 5.7-32 is revised as follows:

West Basin shall implement items a. and b. and progress through the remaining GHG reduction strategies and offset strategies remainder (items c. through e.) to achieve the net carbon neutral threshold of significance. Selection and implementation of the options will be based on their ~~on the basis of the options~~² physical and economic feasibility, as reasonably determined by West Basin, with low-cost options preferred over high-cost options. ~~In the event that options have equivalent costs, options enumerated higher in the above list shall be selected by West Basin over options enumerated later in the above list.~~

Note that this clarifying change presented in the mitigation measure does not result in a decrease in the effectiveness of the proposed measure, does not result in an increase in the severity of the identified impact after mitigation, and does not preclude meaningful review and comment.

Response MBCH3-59

There is no public process in the verification of the annual report. As the Draft EIR describes on page 5.7-32, Mitigation Measure GHG-2 requires West Basin to validate and verify the findings of the annual report by a third-party accredited under a state-recognized standard, such as ISO 14065, which specifies principles and requirements for validation or verification of GHG accounting, or a similar standard.

Response MBCH3-60

As explained in the footnotes to Table 5.7-6, energy savings estimates from West Basin's water conservation and recycling programs are based on the average energy intensity of imported water. Because the water supplied by the proposed Project (after mitigation) will have net carbon neutral GHG emissions compared to imported water, the expected emissions reductions associated with water conservation would remain the same.

Response MBCH3-61

The Draft EIR Subsection 3.5.2 provides a discussion of the options for managing the dredge materials on pages 3-24 and 3-25 and explains the materials to be dredged would be sampled and analyzed for hazardous constituents prior to dredging. Samples would be collected in compliance with USEPA dredge sample collection methodology. The disposal options would be based on the analytical testing results and would be in compliance with all federal, state, and local regulations. As noted in the Draft EIR on page 3-25, Footnote 7, it is assumed that a majority of the dredged materials will be suitable for offshore disposal because the proposed offshore dredging location has not been identified previously as a contamination area. Contaminated materials, if any, are assumed to be negligible in volume and could be disposed of at any number on onshore licensed disposal facilities permitted to accept the materials. In the unlikely event that onshore disposal is necessary, acceptance criteria for onshore disposal facilities are discussed in the Draft EIR Section 5.8 on page 5.8-1.

Response MBCH3-62

Mitigation Measures HAZ-3 through HAZ-6 are described in the Draft EIR Subsection 5.8.4 on pages 5.8-24 and 5.8-25.

HAZ-3 is the preparation and implementation of an Anchoring Plan that would be in compliance with U.S. Coast Guard regulations, which include required plan elements (performance standards). The performance standard for the Anchoring Plan is the communication of anchoring procedures and the preparation of a response plan in the unlikely event that a vessel becomes unanchored. Mitigation Measure HAZ-3 provides a list of the required plan elements that would be expanded to address U.S. Coast Guard regulations regarding mooring during offshore construction and routine maintenance. The measure requires a description of vessels to be used, delineation of safety and anchor zones, mapping of areas with kelp, seagrasses, and hard substrate

if they exist in the work area, and identification of vessels and buoys including daylight and nighttime marking schemes.

HAZ-4 is the preparation and implementation of a Marine Safety Plan that would also be in compliance with U.S. Coast Guard regulations, which include performance standards. The performance standard for the Marine Safety Plan is the communication of safety protocols as listed in the mitigation measure. Mitigation Measure HAZ-4 provides a list of the required plan elements that would be expanded to address U.S. Coast Guard regulations regarding offshore mooring during construction and routine maintenance. The measure requires a description of marine operations protocols, critical operations and curtailment plan, offshore fueling procedures, storm procedures, marine communications plan, marine transportation plan for barges, tugboats, crewboats, and other vessels, and a navigational marking and lighting plan.

HAZ-5 is the preparation and implementation of a Marine Oil Spill Response Plan that would also be in compliance with U.S. Coast Guard regulations, which include performance standards. The performance standard for the Marine Oil Spill Response Plan is the communication of procedures for the cleanup of marine oil spills to the satisfaction of the U.S. Coast Guard. Mitigation Measure HAZ-5 provides a list of the required plan elements that would be expanded to address U.S. Coast Guard regulations regarding offshore mooring during construction and routine maintenance. The measure requires a description of spill response team and equipment, notification requirements including names and phone numbers of agencies to be notified, and a description of marine spill scenarios and response procedures.

HAZ-6 is the preparation and implementation of a Diver Safety Plan that would also be in compliance with U.S. Coast Guard regulations, which include performance standards. The performance standard for the Diver Safety Plan is the communication of safe diving procedures to divers, including the preparation of a job safety analyses for each dive and a plan for evacuating injured divers. Mitigation Measure HAZ-6 provides a list of the required plan elements that would be expanded to address U.S. Coast Guard regulations regarding offshore mooring during construction and routine maintenance. The measure requires a description of the diving techniques and equipment that will be used to support the underwater work activities, a description of the job safety analysis tool that will be used to prepare for each day's diving operations, an evacuation plan for evacuating injured divers, and a contact list for local emergency services organizations and facilities.

Response MBCH3-63

Both the Local and Regional Projects are evaluated against baseline conditions. The Draft EIR Subsection 3.4.2 explains on page 3-14 that the Regional Project would result in a larger capacity desalination plant than the Local Project, and therefore, would result in the generation of more water. The Regional Project components assessed in the Draft EIR would be in the same locations as the Local Project components, and some components would have a larger footprint than the Local Project. However, from a hazardous materials perspective, the Local and Regional projects are both required to comply with the same federal, state, and local regulations. Therefore, it is not unreasonable to analyze the Regional project as a larger version of the Local project that would have similar impacts.

Response MBCH3-64

As described in the Draft EIR Subsection 5.9.4, consistent with the requirements of the 2015 California Ocean Plan Amendment, the Project-specific dilution analyses assume zero ocean current velocity, representing the worst-case condition in terms of brine dilution with receiving waters. As described in the Draft EIR Subsection 5.9.2 the environmental parameter most relevant for dilution and mixing is the receiving water density structure, and the physical water quality parameters (e.g., salinity, temperature, and dissolved oxygen) within the Santa Monica Bay exhibit distinct seasonal variations and spatial distributions (such as with depth). Such variation is a result of interactions among bathymetry, vertical mixing, freshwater discharge, and biological processes. The seasonal cycles correspond to oceanic patterns such as water masses transported by the California Current from the northwest and the Southern California Countercurrent from the south and freshwater discharges from major surface water bodies.

Overall, and contrary to the comment, the effect of ocean currents increases dilution compared to the zero current results; brine does not collect within the countercurrent. Resulting salinities at the Brine Mixing Zone (BMZ) boundary would be substantially lower than those reported in the Draft EIR because greater dilution would be achieved through additional dynamic mixing from waves or ocean currents. Neglecting the effect of currents (assuming zero current), consistent with the methodology prescribed in the Ocean Plan for assessing salinity impacts from brine discharges, represents the most conservative (i.e., the “worst-case”) scenario, and therefore, the Ocean Plan regulations related to salinity would continue to be met for all anticipated ocean currents occurring in Santa Monica Bay.

Given the Ballona Creek location (north of the proposed Project site) and the predominant ocean current flow direction (from north to south, see Draft EIR Subsection 5.9.4 on page 5.9-54), and the results of the dilution modeling which indicates the Project would meet Ocean Plan thresholds well within the Marine Study Area, water quality at Ballona Creek would not experience increases in salinity from brine discharge. The Draft EIR provides substantial evidence that project direct and indirect effects on marine habitats and biological resources would be confined to a relatively small area and would not have the potential to generate impacts to habitats or marine species at greater distances than the Marine Study Area. See also *Master Response: Marine Biological Resources Study Area*.

Response MBCH3-65

The Draft EIR Appendix 2 presents the Feasibility Assessment of Subsurface Seawater Intakes that includes two separate evidence-based studies. In response to this and other similar comments, a supplemental study has been conducted that expands upon the Subsurface Intake (SSI) Feasibility Study provided in the Draft EIR. The findings of this supplemental study (provided as Final EIR Appendix 13) present further evidence that confirms West Basin’s conclusions in the

Draft EIR, and provide support for future regulatory decisions. See also *Master Response: Supplemental Studies*.

Response MBCH3-66

Water quality sampling conducted as part of West Basin's Pilot Project located in El Segundo (at the proposed Project site) and Demonstration Project located in Redondo Beach documented that water quality conditions in Santa Monica Bay are highly variable over time and that some existing constituent concentrations at times exceeded the California Ocean Plan water quality objectives under baseline conditions (Draft EIR Subsection 5.9.4, page 5.9-54; see also response to comment LARWQCB-11 for additional details).

It should be noted that the proposed Project would not add or contribute new or additional pollutants to Santa Monica Bay. Although the RO treatment process would result in the discharge of increased concentrations of constituents within a localized area or mixing zone, the overall total loading of chemicals and minerals being discharged into Santa Monica Bay would not be increased with implementation of the proposed Project as compared to existing (baseline) conditions. The proposed Project proposes to return to Santa Monica Bay all the associated water quality constituents that originated in the source water but were rejected from the RO treatment process.

As discussed in the Draft EIR (Subsection 5.9.4, *et seq.*), the assessment of impacts to water quality comprehensively applied and considered the applicable regulations discussed in the regulatory setting section (Draft EIR Subsection 5.9.1, *et seq.*), such as the National Pollution Discharge Elimination System (NPDES) permit program as well as the Water Quality Objectives of the California Ocean Plan. As described in detail in the Draft EIR Subsections 5.9.1 and 5.9.4 and summarized in *Master Response: CEQA and Ocean Plan Compliance*, West Basin will prepare and submit information required by the Ocean Plan when submitting the NPDES discharge permit application to the Los Angeles Regional Water Quality Control Board (LARWQCB), including a Report of Waste Discharge, which will provide a detailed analysis of compliance with the Ocean Plan water quality standards. Further, as part of the NPDES permit application, Whole Effluent Toxicity (WET) testing would be required for the facility point of discharge, representing an integrated approach for assessing the potential for acute and/or chronic toxicity of proposed discharges. The primary objective of WET testing is to ensure that effluent released from industrial and municipal facilities into the nation's waters does not cause unacceptable levels of toxicity to aquatic life. Subsection 5.9.1 describes that the point of compliance for water quality standards relating to operational discharges is the edge of the Zone of Initial Dilution (ZID). Such an approach for water quality standards acknowledges the concept of a regulatory mixing zone where water quality constituent concentrations contained in discharges undergo rapid and substantial reduction via dilution. Within the mixing zone, water quality criteria may be exceeded as long as toxic conditions are prevented. To determine whether an effluent has the potential to be toxic, WET tests are performed on various aquatic test species.

WET testing represents a standardized measure of the aggregate toxic effect of an effluent measured directly by a toxicity test and is used to evaluate biological impacts of discharges for NPDES permitting. The use of biological testing provides a means to evaluate the impact of

chemical and physical mixtures at the site of discharge and will consider benthic species and/or species most relevant to the site. By nature, and definition, toxicity cannot be measured analytically, as is done for assessing the in-pipe concentrations of constituents regulated under the Ocean Plan with numeric Water Quality Objectives (WQOs). Chemical analyses are practical only when all potential constituents present in an effluent are known. WET testing assesses the combined toxic effects of all constituents of an effluent, known or unknown.

Response MBCH3-67

The impact analysis in the Draft EIR incorporates the findings of a quantified analysis of copper dissolution rates from the proposed copper/nickel wedgewire screens. The Project-specific copper dissolution assessment was conducted for the proposed intake structures to determine the potential implications for water quality impacts in the context of numeric water quality standards defined in the California Ocean Plan. The analysis of copper dissolution, presented in the Draft EIR Appendix 4B (Applied Marine Sciences, 2018. Technical Memorandum: Dissolution Estimate of Copper:Nickel Corrosion from Wedgewire Screens) and incorporated into the analysis of impacts under Impact 5.9-2 (Draft EIR Subsection 5.9.4), determined that the dissolution of copper into seawater would not result in exceedances of the California Ocean Plan water quality objectives for copper. Specifically, the mean concentrations of copper-nickel alloy loss were calculated to be 0.03 micrograms per liter ($\mu\text{g/L}$) for the 90:10 and 0.05 $\mu\text{g/L}$ for the 70:30 copper-nickel alloy wedgewire screens (see Table 5.11-10, Draft EIR Section 5.11, *Marine Biological Resources*, page 5.11-55). In comparison to the 6-month median of 3 micrograms per liter ($\mu\text{g/L}$), daily maximum of 12 $\mu\text{g/L}$, and instantaneous maximum of 30 $\mu\text{g/L}$ identified as the California Ocean Plan Water Quality Objectives for Protection of Marine Life thresholds (see Subsection 5.9.1), the estimated daily and instantaneous copper concentrations resulting from corrosion of the copper-nickel alloy would be orders of magnitude smaller. CEQA Guidelines Section 15126.6 requires that an EIR consider alternatives that can avoid or substantially lessen significant impacts of a project. The use of copper-nickel alloy wedgewire screens would not result in an impact requiring the EIR to evaluate a stainless steel alternative; no change has been made to the EIR as a result of this comment.

Response MBCH3-68

Water quality impacts of the Regional Project brine discharge are not assessed against the Local Project's future baseline as the commenter asserts. Water quality impacts from the Regional Project are presented under Impact 5.9-2 (Draft EIR Subsection 5.9.4 page 5.9-58 *et seq.*) which explains that impacts to water quality standards or Waste Discharge Requirements would occur if operational discharges from the Regional Project resulted in salinity concentrations greater than 2 ppt above *ambient salinity levels* (i.e., baseline salinity of Santa Monica Bay under existing conditions, not existing conditions at the time of implementation of the Regional Project) at the edge of the BMZ. The methodology and assumptions for assessing Regional Project salinity impacts are the same as described for the Local Project and are presented in detail in Appendix 14A of the Final EIR. Assuming the most conservative scenario, the model analysis demonstrates that operational discharges from the Regional Project would meet the California Ocean Plan salinity standard (Final EIR Table 5.9-8).

Response MBCH3-69

As described on page 5.9-16 of the Draft EIR, the LARWQCB General NPDES Permit No. CAG994004 (R4-2003-0111) (Dewatering Permit) covers discharges of treated and untreated groundwater generated from permanent or temporary dewatering operations, including groundwater generated from construction dewatering activity. As assessed and discussed in detail under Impact 5.9-1 under “Construction Excavation Dewatering Activities” (Draft EIR Subsection 5.9.4, pages 5.9-42 to 5.9-43), construction dewatering at the proposed desalination facility would require West Basin or their contractor(s) to obtain coverage under the Dewatering Permit for dewatering. The permit requires testing of the effluent to identify the presence of potential contaminants and implementation of appropriate treatment and disposal methods. Options for disposal of dewatering discharge include: (a) onsite treatment, then discharge to the sanitary sewer, (b) discharge to mobile storage tanks, then transportation to a licensed treatment or disposal facility permitted to accept the waste, or (c) onsite treatment, then discharge to groundwater (recharge wells and trenches). An ongoing monitoring and reporting program, with LARWQCB review and approval, is also required under this permit to ensure on-site treatment and/or disposal adheres to the conditions of the Dewatering Permit. Mandatory compliance with the requirements of the Dewatering Permit would ensure that proposed Project dewatering discharges would not mobilize pollutants, result in exceedances of water quality standards, or otherwise degrade water quality or deleteriously affect the beneficial uses of receiving waters.

In addition, as discussed under Impact 5.9-1 and described in detail in Section 5.8 (Draft EIR page 5.8-22 *et seq.*) Mitigation Measure HAZ-1 shall include procedures for managing groundwater generated from dewatering activities, including contaminated groundwater, if any. The disposal procedures for contaminated groundwater would be required to comply with the regulations listed in Subsection 5.8.1 which include RCRA, Hazardous Materials Business Plan Program, Hazardous Waste Control Law, and the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, all of which require that hazardous waste be disposed at licensed facilities permitted to accept the waste. The specific disposal facility – the sewer system or a hazardous waste treatment facility – would depend on the nature and concentrations of chemicals in the dewatering effluent. See response to comments CCC-13 for additional details.

Response MBCH3-70

As discussed in detail under Impact 5.9-3 (Draft EIR Subsection 5.9.4, page 5.9-61 *et seq.*), groundwater levels in the City of El Segundo vary, but are typically 20 feet below ground surface. While proposed Project construction may require dewatering where deep excavations encounter shallow or perched groundwater, any such dewatering activities would be temporary, highly localized, and would involve the extraction of low volumes of shallow groundwater (i.e., not groundwater from aquifers used for municipal or industrial water supply). No long-term pumping of groundwater from coastal aquifers is proposed as part of the Project and, as such, dewatering activities conducted during construction would not result in significant long-term effects to local groundwater supplies, such as saline intrusion into coastal aquifers. As discussed on page 5.9-35 of the Draft EIR, seawater intrusion has already occurred along the coastal area; the temporary construction dewatering for the desalination facility would not change this condition. In addition,

as explained on pages 5.9-35 and 5.9-36 in the Draft EIR, the Los Angeles County Department of Public Works (LACDPW) owns and maintains a seawater barrier system located inland from the ESGS. This system injects barrier injection water to maintain protective levels to protect the aquifer from seawater intrusion.

Response MBCH3-71

This comment describes similar concerns expressed in comment MBCH3-49. The comment asserts that the decreased elevation of the proposed Project site could expose people to risks associated with flooding, tsunamis, or wave run-up. As explained in the response to comment MBCH3-49 and on page 5.9-72 in the Draft EIR, Section 5.9, *Hydrology and Water Quality*, sea level rise is an existing environmental condition, and unless the proposed Project will exacerbate this condition, it is not considered a potentially significant impact under CEQA.

Nonetheless, West Basin has evaluated the potential effects of anticipated future sea level rise and will implement further design measures to protect the proposed Project from potential effects of sea level rise, as explained in the response to comment MBCH-49 and in the Draft EIR, Section 5.9, *Hydrology and Water Quality*, Impact 5.9-6 on pages 5.9-72 through 5.9-78. In the interest of providing as much information as possible, West Basin conducted a site-specific Coastal Hazards Analysis for the proposed desalination facility at the ESGS North and South Sites, a copy of which is provided in Appendix 5 of the Draft EIR. In response to this and other comments, however, West Basin also prepared a supplemental Coastal Hazards study (see *Master Response: Supplemental Studies* and Final EIR Appendix 15) that considered a high-risk sea level rise projection and the “extreme risk aversion” scenario known as the “H++” scenario. The results of the study confirmed that development on the site would be constrained, but feasible.

While the Draft EIR acknowledges on page 5.9-76, that although the existing southern berm along 45th Street would be retained, the entire ESGS South Site behind the 45th Street berm would be lowered to roughly at grade with the bike trail in order to reduce visual impacts, and would therefore, require coastal hazard protection similar to that provided by the existing ESGS seawall. While the Draft EIR acknowledges that the purpose of Mitigation Measure HYDRO-1 is to require the final Project engineering design to minimize conflicts with the applicable Coastal Act Section 30235 (Construction altering natural shoreline) and Section 30253 (Safety, stability, pollution, energy conservation, visitors), Mitigation Measure HYDRO-1 has been revised in response to comment CCC-19, to include the relevant Coastal Act sections as performance standards. See *Master Response: Supplemental Studies*, and Final EIR Appendix 15. As noted in Draft EIR Section 7.4, one of the reasons the North Site is preferred over the South Site is because of the reduced total construction time because of reduced grading (see Draft EIR Section 7.4).

Response MBCH3-72

See response to comment CCC-31 regarding the proposed Project’s potential to conflict with the LCP’s Power Plant (PP) land use designation.

Response MBCH3-73

The potential presence of hazardous construction materials, such as oils, lubricants, paints, thinners, solvents, cleaning agents, degreasers, glues, other adhesives, cement, concrete, and asphalt mixtures, on work vessels engaged in the modification of the ESGS intake and discharge pipelines are temporary and must be stored onboard in accordance with both State and Federal regulations. Any “leaching or leaking” of these materials from the work vessels by definition is an accidental release and must be prevented and responded to immediately. As discussed in the Draft EIR on pages 5.11-43 and 5.11-44, the application of mitigation measures HAZ-4 and HAZ-5, respectively, are designed to prevent the accidental release of these materials if present on board any of the work vessels, and therein preventing any potential significant impact should they be released. Furthermore, as indicated in Section 5.8, *Hazards and Hazardous Materials*, none of these products, with the exception of vessel fuel, should be present on the offshore work vessels in quantities sufficiently large to pose a significant threat to marine biota if accidentally released.

Response MBCH3-74

The Draft EIR Section 2.10.10 presents West Basin’s extensive evaluation of the technical, economic, social and environmental feasibility of incorporating subsurface intakes into the proposed Project design. Based on the extensive research and site-specific field-testing and analysis, none of the eight subsurface intake technologies evaluated were found to be feasible for the design intake rate of 40 MGD at the ESGS facility. See *Master Response: CEQA and Ocean Plan Compliance*, *Master Response: Supplemental Studies*, and Final EIR Appendix 13.

Response MBCH3-75

The Draft EIR Subsection 7.2.3, page 7-35 identifies alternative brine discharge solutions including co-mingling of brine with wastewater discharges at the City of Los Angeles Hyperion Water Reclamation Plant. As noted on page 7-35, West Basin recognizes that the Ocean Plan Amendment requires that desalination projects demonstrate the best available site, design, technology and mitigation for the treatment facility, intake and discharge facilities. As such, the Draft EIR included two studies in Appendix 10 and Appendix 11 that evaluate the feasibility of using the existing Hyperion discharge to co-mingle the brine discharge as recommended in the Ocean Plan Amendment. The studies identified constraints that made use of the Hyperion discharge facility infeasible. The constraints included the potential for the brine contribution to result in exceedances of Hyperion’s existing NPDES permit such that reconfiguration of the diffusers would be required at the end of the five-mile outfall to comply with the Ocean Plan Amendment. The Draft EIR describes why co-mingling of brine with wastewater discharge is not the preferred discharge technology. Nevertheless, West Basin recognizes that during permitting, the feasibility of this alternative will be evaluated for consistency with the Ocean Plan Amendment. For additional discussion regarding Ocean Plan compliance and the assessment of impacts under CEQA see *Master Response: CEQA and Ocean Plan Compliance*.

Response MBCH3-76

See *Master Response: Marine Biological Resources Study Area*. The Draft EIR provides substantial evidence that proposed Project direct and indirect effects on marine habitats and biological resources would be confined to a relatively small area and would not have the potential to generate impacts to habitats or marine species at greater distances than the Marine Study Area, as demonstrated through the empirical transport modeling and characterization of the Environmental Setting. Therefore, species that may be inhabiting the area near the terminus of Ballona Creek, for example, would not be affected by the proposed Project construction or operation, regardless of their sensitivity to salinity increases.

Response MBCH3-77

As described in Draft EIR Subsection 5.3.2, page 5.3-30 and displayed on Figure 5.3-2, critical habitat for the snowy plover occurs within the study area. Impacts to critical habitat are sufficiently analyzed on Page 5.3-30. Impacts to snowy plover are sufficiently analyzed in Subsection 5.3.4, page 5.3-33.

Response MBCH3-78

Contrary to the commenter's assertion, the Draft EIR does indeed address underwater noise and vibration generated by potential Project-related pile-driving. The topic is extensively discussed in the Draft EIR Subsection 5.11.4 (pages 5.11-44 through 5.11-50). In addition, the Draft EIR provides calculations of projected underwater noise generated by Project-related pile-driving (Draft EIR Table 5.11-7, Draft EIR page 5.11-50). Mitigation Measure BIO-M1 (Draft EIR pages 5.11-62 -5.11-63) requires the Project sponsor to prepare a noise reduction plan prior to Project implementation that re-calculates all potential underwater noise generated by the final piling design, and it requires the Project sponsor to develop a plan to reduce underwater noise to levels determined by NMFS not to harm fish and marine mammals. This plan should include all feasible BMPs currently known to reduce underwater noise generation, as well as any new BMPs developed after the preparation of the CEQA analysis and prior to Project implementation. This approach ensures that the best technology is employed to reduce the generation and potential effects of underwater noise from the proposed project that is years, if not decades, from its implementation.

Estimates of underwater noise levels, noise transmittal, and noise attenuation with distance are calculated based on technical data available for pile type, pile driver type, and pile-driving scenario. Calculation of sound attenuation for projected pile-driving determines the distance at which NMFS establishes underwater sound criteria for the proposed Project. These SEL Cumulative threshold distances for fish, and for marine mammals, were presented in Draft EIR Table 5.11-7, and were updated in the Final EIR based on revised technical data, and are presented as part of this response. As illustrated in the revised Table 5.11-7 below, underwater sound levels high enough to potentially cause acute damage to fish is < 2 meters for a vibratory hammer and <18 meters for an impact hammer, depending on the pile composition and diameter used for the piling. Cumulative SEL levels resulting in behavioral changes, depending on the type of pile hammer used, range between 1 and 215 meters. SEL Cumulative harassment underwater

sound levels for marine mammals range between 0.1 and 34.8 meters, depending on the species, piling composition and diameter, and type of hammer used.

Based on these findings, establishing a 500-meter zone by which extra BMP measures are required was considered to be overly cautious. For this proposed Project, work barges, anchoring arrays, and support boats are expected to utilize an area slightly less than 500-meters in circumference. Past marine mammal observations have demonstrated that marine mammals naturally avoid activities and vessels associated with underwater construction. Considering that neither SEL Cumulative sound thresholds, nor impacts associated with construction-related vessels and activities, are estimated to occur at distances greater than 500-meters, requiring additional measures to reduce noise levels that do not exceed these thresholds within this zone is not necessary. Moreover, it would only be necessary to apply additional BMPs if the generated underwater noise levels exceeded established acceptable criteria at some distance from the sound source within which marine mammals could reasonably be expected to occur.

In response to this and other comments (see response to comment SLC-26), the Draft EIR text in Table 5.11-7 is revised as follows:

**TABLE 5.11-7
ESTIMATED VIBRATORY AND IMPACT HAMMER PILE-DRIVING SOUND LEVELS AND DISTURBANCE TO CRITERIA LEVELS**

		Distance to Sound Level Thresholds (meters) for Non-impulsive <u>Vibratory Hammer</u> Sound Sources ²								
Pile Type	Equipment Type	<u>SEL Cumulative Threshold</u> ⁴		150 dB (Fish-Behavioral) ^{3, 4}	<u>SEL Cumulative Threshold</u> ^{3, 4}					Attenuation Equipment
		187 dB (Fish ≥2g)	183 dB (Fish < 2g)		199 dB (Low-Frequency Cetaceans)	198 dB (Mid-Frequency Cetaceans)	173 dB (High-Frequency Cetaceans)	201 dB (Phocid Pinnipeds)	219 dB (Otariid Pinnipeds)	
12-inch Steel Pipe Pile ¹	Vibratory	4-0.0	4-0.0	12	20 2.3	108 0.1	29.5 2.1	12.1 1.2	0.9 0.1	None
13-inch Steel Pipe Pile ^{1,5}	Vibratory	1.0	4-2.0	25-22.0	20 4.3	108 0.2	29.5 3.8	12.1 2.3	0.9 0.2	None
16-inch Steel Pipe Pile ¹	Vibratory	1.0	4-2.0	4.0	58.5 5.1	5.2 0.3	86.5 4.4	35.6 2.7	2.5 0.2	None
16-inch Fiberglass/ concrete pile ¹	Vibratory	0.0	1.0	1.0	4.3 1.8	0.4 0.1	6.4 1.6	2.6 1.0	0.2 0.1	None
		Distance to Sound Level Thresholds (meters) for Impulsive <u>Impact Hammer</u> Sounds Sources ²								
Pile Type	Equipment Type	<u>SEL Cumulative Threshold</u>		150 dB (Fish-Behavioral) ^{3, 4}	<u>SEL Cumulative Threshold</u> ^{3, 4}					Attenuation Equipment
		187 dB (Fish ≥ 2 g)	183 dB (Fish < 2 g)		183 dB (Low-Frequency Cetaceans)	185 dB (Mid-Frequency Cetaceans)	155 dB (High-Frequency Cetaceans)	185 dB (Phocid Pinnipeds)	203 dB (Otariid Pinnipeds)	
12-inch Steel Pipe Pile ³	Impact	6-1.0	44 1.0	100	4.4 1.8	0.1	2.2	0.7 1.0	0.0 0.1	None
13-inch Steel Pipe Pile ^{3,4,5}	Impact	0 10.0	0 18.0	215	29.2	1.0	34.8	15.7	1.1	None
16-inch Steel Pipe Pile ³	Impact	3 2.0	5 3.0	63	2.7 4.8	0.2 0.2	5.5	1.7 2.5	0.4 0.2	None
16-inch Fiberglass/ concrete pile ³	Impact	0 1.0	1.0	76	0.2 1.2	0.0 0.0	0.5 1.4	0.4 0.6	0.0 0.0	None

NOTES:
¹ Vibratory pile driving hammers have been documented to reduce underwater noise levels a minimum of 14-15 dB and up to 28-29 dB, depending on the pile type, water depth, and type of hammers being used (Caltrans 2015). Estimating the potential underwater noise attenuation distances for steel pipe and fiberglass/concrete pilings using a vibratory hammer, underwater noise levels documented for impact hammers were reduced by 14 dB.
² NOAA 2018b, NOAA 2016b; NMFS 2016; Caltrans 2015, AMS 2018
³ Time duration for using an impact hammer to set any pilings to desired depth assuming the vibratory hammer cannot, by itself, achieve required anchor depth was <1 hour. Calculations assumed 4,440 50 blows per piling, 2 piles per day, XLogR = 15, pulse duration = 0.8 seconds, 2.5 2.0 weighting factor adjustment.
⁴ In calculating the potential SEL cumulative or behavioral threshold distances for fish, if no RMS values available for pile driving calculation, the mean of Peak dB and SEL dB values used. If no SEL value available for the pile driving calculation, then the RMS values is used.
⁵ Data for the installation of the 13-inch steel pilings reflect very shallow water conditions on the Mad River in Arcata, CA and appear to reflect unique underwater noise reflective conditions.

Response MBCH3-79

Draft EIR Subsection 5.11.2, Marine Biological Resources explains on page 5.11-34 that the Ballona Lagoon (adjacent to Marina del Rey), the El Segundo Dunes, and the Palos Verdes Peninsula have been designated as Significant Ecological Areas (SEAs) and Coastal Resource Areas (CRAs) by the County of Los Angeles. Further discussion of Ballona Creek is presented in Draft EIR Section 5.9 Hydrology and Water Quality. The Draft EIR on page 5.9-26, discusses Ballona Creek within the context of the Santa Monica Watershed. Given the Ballona Creek location (north of the proposed Project site) and the predominant ocean current flow direction (from north to south), as explained in Draft EIR Subsection 5.9.4, the ambient water quality at the ESGS in the nearshore area could be affected by the water quality of the Ballona Creek and Marina Del Rey discharge points, particularly during storm events. The Draft EIR provides substantial evidence that project direct and indirect effects on marine habitats and biological resources would be confined to a relatively small area and would not have the potential to generate impacts to habitats or marine species at greater distances than the Marine Study Area. See also *Master Response: Marine Biological Resources Study Area*.

Response MBCH3-80

As described in the Draft EIR Subsection 5.9.2 (page 5.9-32), salinity levels are generally constant in ocean waters, on average around 34 grams per kilogram of water (commonly reported as parts per thousand (e.g., 34 ppt), but can fluctuate within coastal zones due to introduction of near-shore freshwater. The MBC Applied Environmental Sciences, 2017, Existing Conditions Summary states that salinity levels within Santa Monica Bay (SMB) are generally uniform and vary from 33 ppt to 34 ppt (Draft EIR page 5.9-32) and cites a 1993 study. In the next paragraph, MBC 2017 presents salinity data from between 2010 and 2014 that confirms the salinity range cited from 1993.

The diffuser model analysis (Draft EIR Appendix 4C, Final EIR Appendix 14A), which was summarized and incorporated into the analysis of operational impacts (Impact 5.9-2, Draft EIR page 5.9-49 et seq.), assumed a receiving water salinity of 33.5 ppt based on more than 20 years of local NPDES monitoring, consistent with the 33 ppt to 34 ppt range presented in the proposed Project water quality environmental setting.

The characterization of marine habitats and associated marine communities provided in the Draft EIR Section 5.11, *Marine Biological Resources* established the dominant biological taxa and overall community composition of the various marine habitats present within the marine study area and within SMB. This characterization was based on current knowledge of the biological taxa that utilize habitats offshore of California. Consistent with CEQA Guidelines Section 15125, the environmental setting for marine resources needs to characterize the biological communities present, or expected to be present, within the identified study area that would be potentially exposed to proposed Project activities and impacts. The description of the habitats and associated marine biological communities present within the study area were based on an extensive review and analysis of intertidal and subtidal habitats and biological taxa in the Southern California Bight (SCB) in general, SMB more specifically, and where possible, within the study area itself. This information on the study area was provided in MBC 2017, which was then condensed and

summarized in Draft EIR Section 5.11, *Marine Biological Resources*, pages 5.11-12 through 5.11-36.

The information for the marine study area provided in MBC 2017 was augmented by data and information provided in the 2010 lease extension for the El Segundo Marine Terminal located immediately up coast of the marine study area, and by data from a recent fiber optic cable landing CEQA EIR prepared for the City of Hermosa Beach in 2015. It was fortuitous that a major coastal industrial operation is present within the marine study area, which conducted site-specific scientific investigations of subtidal and intertidal habitats and their associated marine biota. Such site-specific investigations do not exist with respect to most of the coast of California. Even though many of the site-specific studies were conducted 5 or more years ago, the scientific information they provide is valid and demonstrates that the taxa inhabiting the various marine habitats within the SCB are also present, and serve the same ecosystem roles, in the marine study area. Because of previously demonstrated anthropogenic impacts on the nearshore waters near the proposed Project site, reductions and loss of certain species in the marine study area have already occurred. Additionally, more recent studies would not be expected to provide any significant increase in scientific data that would change or alter the analysis of potential impacts on the marine ecosystem. The impact analysis was based on potential habitat alterations by the Project and the potential for impacts to all marine organisms utilizing those habitats. For instance, it is irrelevant if species A or species B of a mollusk was present; if the impact was projected to affect mollusks, all species of mollusks present would be impacted. Finally, all special-status species that have any potential to be present in the marine study area and have any reasonable potential for being effected by Project activities have been adequately assessed.

Response MBCH3-81

The commenter is correct in stating that the occurrence of White sharks in the coastal waters of SMB have been increasing in recent years, especially during the recent warmer El Niño years. The commenter's statement that the waters of SMB serve as potential nursery areas is also correct but misleading because all of the State's inshore coastal waters are used by juvenile White sharks as nursery grounds and foraging areas. To better reflect these considerations and the criteria for establishing expected occurrence within the marine study area, column five of table 5.11-3 has been updated for White sharks to read as follows:

~~Low-Moderate Not Expected to Low.~~ Present in coastal waters throughout the State but typically north of the study area. with inshore coastal waters frequently used as foraging areas for juveniles. The presence of juvenile White sharks has been noted to increase in SMB during El Niño conditions, but this increase is typically expected to occur north of the study area.

It is an incorrect assertion, however, that the proposed Project's impact analysis omitted White sharks from the analysis and that the Draft EIR only identified two FESA or CESA protected species that had any probability to occur within the marine study area. In fact, 15 taxa of fish and marine mammals were identified as having a low to high probability of occurrence in the marine study area. The analysis of potential Project effects on marine biological resources evaluated those impacts initially on an altered or damaged habitat-basis, and then considered all marine organisms and trophic groups present within those habitats and whether the Project-identified

changes would directly or indirectly impact those taxa. As stated in the Draft EIR (pages 5.11-37 through 5.11-76) the potential for disturbance to pelagic habitat-based taxa during construction is from the temporary loss of foraging area, the temporary decrease in water clarity, and from underwater noise. During operations, potential impacts would include the temporary exposure to the brine plume located within the 0.3 to 0.9 acre Brine Mixing Zone, which represents < 0.04 percent of the pelagic habitat within the marine study area. Based on the defined CEQA evaluation criteria (Draft EIR Subsection 5.11.3, pages 5.11-36 to 5.11-37), the potential for Project-related activities to impact White sharks remains less than significant. Finally, the data used to assess the potential occurrence of special status species does not come from outdated data from surveys in 2001, but as documented in the footnotes of Draft EIR Table 5.11-3 in the Draft on EIR page 5.11-30, the key references used include scientific documents dated 2008, 2010, 2011, 2014, 2017, and 2018.

Response MBCH3-82

See response to comment MBCH3-81.

Response MBCH3-83

The Draft EIR in its discussion of underwater noise from pile-driving activities establishes that underwater noise at high decibel levels causes harm to fish and marine mammals (Draft EIR pages 5.11-44 to 5.11-50). This harm can range from acute effects including death, and indirect effects resulting in altered behavior. NOAA, as the Federally mandated agency responsible for enforcement of the MPA and FESA for marine species, has established underwater noise threshold levels for both fish and marine mammals below which no harm is expected. These thresholds for Level A (acute effects) are provided in Draft EIR Table 5.11-7. Level B (harassment levels) have been established as 120 and 160 dB for non-impulsive and impulsive sound sources, respectively, and were provided in the Draft EIR on pages 5.11-47. NOAA has already gathered sufficient scientific data as well as conducted a number of studies in order to establish acceptable underwater noise levels at which little to no harm to fish or marine mammals are expected to occur. NOAA's regulatory determinations and potential effect levels were duly cited and provided in the Draft EIR on pages 5.11-47-48.

The recent scientific work conducted by Ted Cranford and referenced by the commenter was published on April 23, 2018, after the March 27, 2018 release of the Draft EIR. Cranford used computer tomography of an entire minke whale and combined it with custom-developed computer simulation tools to model how whales hear sounds. This research is not directly relevant to the analysis in the EIR because it is not necessary to understand how a specific species hears sound in order to recognize negative effects of sound on that animal above certain sound levels. NOAA, as the Federally mandated agency responsible for implementation of the Marine Mammal Protection Act, has determined at what sound levels acute or chronic effects occur on marine mammals. It is in accordance with these Federally established noise thresholds that the Draft EIR assessed proposed Project related underwater noise generation and potential effects.

Response MBCH3-84

All work vessels, including work barges, commercial diver tenders, pipe laying ships, etc. are expected to originate from the Ports of Long Beach and Los Angeles (POLB/POLA), as stated in Draft EIR Subsection 3.5.2 and again on page 5.11-39. The marina at Marina Del Rey is too small to support or dock these large offshore construction and support vessels. Smaller crew boats that may be used to ferry work crews on a daily basis during offshore construction activities for the proposed Project may originate from POLB/POLA or Marina Del Rey, since smaller vessels can be used. This option is also accurately described in Draft EIR Subsection 3.5.2 and on page 5.11-39. The potential impact analysis for marine biological resources considered different types of vessels originating from all local harbors, as well as POLB/POLA, as stated in the Draft EIR on page 5.11-39.

Response MBCH3-85

The bulk of the information on recovery of benthic infauna following dredging comes from experience with offshore sand mining projects for beach nourishment, construction materials, and precious metals. Most of these scientific studies were conducted worldwide in the late 1990's and early 2000's. Although several coastal desalination projects have been constructed in California, none of those projects have been required to conduct post-construction benthic recovery studies. The commenter's concern regarding dispersal of species and its role in mortality and harassment is unclear. The Draft EIR analysis assumed 100 percent mortality of all infaunal and epifaunal organisms inhabiting dredged sediments. This might include some small fish, such as blennies, that may be extracted with the dredged sand. Once this material is placed back on the seafloor, it will become recolonized through emigration from surrounding, undisturbed sediments and by annual spring recruitment of larvae that settle out onto the seafloor from the overlying water column. Therefore, a few months to several years were noted in the Draft EIR in order for the sediments to achieve full recovery, given that it might take a few years of recruitment to fully recolonize the sediments.

Response MBCH3-86

The analysis of potential dredging effects on marine seafloor habitat and associated invertebrate and fish taxa is presented in the Draft EIR on pages 5.11-39 through 5.11-43. It includes the temporary loss of approximately 8 acres of seafloor habitat used for fish foraging. Additional impacts to the seafloor habitat include increased turbidity, shading and light attenuation, and potential entrainment of small, less mobile fish and invertebrates. The Draft EIR determination that proposed Project dredging activities would result in a less than significant impact was based on multiple factors as outlined in the methodology (Draft EIR pages 5.11-36 through 5.11-38). In reference to the commenter's concern about entrainment of fish and less motile invertebrates during dredging, as discussed in the subsection entitled Marine Wildlife Entrainment (Draft EIR page 5.11-41), the proposed Project will use a clamshell dredge as prior studies by the USACE (Reine and Clark 1998) have demonstrated that this type of dredge substantially limits the entrainment of fish. Fish are typically not entrained because most fish swim away from the actual dredging area, and because fish stay away from the area due to the physical disturbance created by the dredge bucket entering and exiting the water column. However, some fish, such as small

blennies, and epifaunal invertebrates, that tend to either hide in burrows in the sediment or are too slow to move away from the dredge bucket, may be entrained together with the sediments during dredging. When this material is side-cast the material is winnowed into the water column just above the seafloor allowing many of the entrained fish and some of the epifaunal invertebrates to swim or float away. The combination of the proposed dredging equipment, the use of side-casting, the documented behavior of fish in response to dredging activities, and the small area of the seafloor being temporarily disturbed, resulted in a determination of less than significant impact from proposed Project dredging activities.

Additionally, the distribution of epibenthic invertebrates, such as urchins, sea stars, sea pens, sand dwelling anemones, are typically fairly broad and the numbers entrained by the clamshell dredge are limited and low. Recovery of these organisms, like the benthic infauna are fairly rapid, typically faster than that required for benthic infauna.

Response MBCH3-87

As with the response to comment MBCH3-85 above, the determination of an impact was based on multiple criteria (Draft EIR pages 5.11-36 through 5.11-38). Relative to increased turbidity from proposed Project dredging activities, it was based on the extremely small area of seafloor being dredged (<0.4 percent), the short duration of dredging activities (< 60 days), the standardized permit requirements issued by State and Federal agencies, which routinely include all existing BMPs to reduce suspended sediments, the grain size composition of the sediments being dredged, and naturally occurring oceanographic conditions that would be expected to quickly disperse any generated turbidity plume. These BMPs include the use of silt curtains, gunderbooms, dredging operation controls such as longer cycle times to reduce the speed at which a loaded dredge bucket is pulled through the water column, elimination of multiple bites with the dredge bucket, and using environmental dredge buckets as appropriate and feasible. These BMP's were listed in Section 5.9, *Hydrology and Water Quality*, on page 5.9-45.

Response MBCH3-88

The Draft EIR Subsection 2.10.4 presents the results of an impingement and entrainment study for the West Basin Demonstration Desalination facility (Tenera 2014) and the entire report is included as Appendix 4A to the Draft EIR. The report assessed impingement and entrainment impacts for the West Basin Demonstration Desalination Facility and a conceptual full-scale desalination facility. Appendix 4A was discussed in Draft EIR Subsection 2.10 as Project Development Background, and provided an overall assessment of the impacts of the demonstration facility, of a proposed full-scale facility, and of the potential reductions in impacts due to the use of wedgewire screens. In fact, while the Draft EIR explains on page 2-33 that “losses of 1 to 2 percent of the source water populations for the majority of the taxa analyzed,” the next sentence on the same Draft EIR page explains that the “report findings indicate that screened ocean intakes fitted with wedgewire screens significantly reduce or eliminate potential impingement effects and entrainment impacts.”

Furthermore, the analysis of impacts on the marine environment from the proposed Project is evaluated in Draft EIR Subsection 5.11.4. By utilizing the approach to mitigation described in the

2015 Ocean Plan Amendment, the implementation of Mitigation Measure BIO-M2 will counteract annual larval losses by increasing area of habitat potentially used for fish spawning and as fish nursery grounds.

Response MBCH3-89

The Draft EIR did not require an independent assessment of cross-current velocities across the proposed wedgewire screened intakes. A previous site-specific evaluation of wedgewire screened intakes (Tenera 2014, see Draft EIR Appendix 4A) was conducted under operating conditions comparable to the proposed Project (1.0 mm wedgewire screens with intake flow velocities of <0.5 fps), demonstrating that no impingement of larval organisms or larger fish occurred. The analysis in this study confirmed that under the proposed operating conditions and at a location near the proposed Project, impingement did not occur. Additionally, the approach velocity of ocean water flowing across the screen's surface was calculated, given an intake flow rate of 0.5 fps, would be approximately 0.141 fps (GHD 2018). This velocity represents the cross-flow current speed needed to prevent impingement. Surface currents in SMB average between 0.3 – 0.66 fps (Hickey 1992), not including wind wave or storm surge, which would increase these average figures.

Response MBCH3-90

The previously conducted Intake Effects Assessment Report (Tenera 2014, see Draft EIR Appendix 4A) referenced by the commenter assessed the potential for impingement on the wedgewire screen by a scaled-down pilot version of an ocean intake in SMB. This pilot intake facility was operated under the same intake water flow rate of <0.5fps and using a 1.0 mm slot-width screen, as is proposed by the Project. The results of this study are directly applicable to the assessment of the Project's impingement potential, regardless of actual intake flow volume. Flow volume only becomes critical in estimating potential total entrainment of planktonic organism <1.0 mm in size. See also response to comment MBCH3-89.

Response MBCH3-91

The Draft EIR Section 5.11, *Marine Biological Resources*, does not make any reference or statements concerning entrainment of species >2 mm. The analysis of entrainment (Draft EIR pages 5.11-49 through 5.11-54) does consider the potential for entrainment of organism < 1 mm or close to 1 mm in size based on the wedgewire screen. The Intake Effects Assessment Report (Tenera 2014) previously referenced by the commenter states that some larval fish and invertebrate organisms < 1mm in size or close to 1 mm in size would still be expected to occur. This conclusion was included in the analysis of entrainment (Draft EIR page 5.11-51). The analysis on entrainment also considered larval fish head size and identified those taxa whose larval head size were substantially larger than 1 mm as planktonic organisms that would most likely not be entrained (Draft EIR Table 5.11-9).

Response MBCH3-92

The Draft EIR did in fact consider the potential impacts from increased salinity on organisms in the marine study area, including planktonic organisms. As discussed in more detail in the Draft

EIR (on pages 5.11-56 through 5.11-58) the potential effect of increased salinity, as high as 36.5 ppt, was assessed for different kinds of taxa, including plants, invertebrates, fish and plankton. As presented in the Draft EIR Table 5.11-11, toxic effects from increased salinity to planktonic organisms such as Mysid shrimp, are only documented to occur when salinities are >47.8 ppt for survival and >49.7 ppt for growth. The projected salinity of the Project discharge is modeled to be <35.5 ppt at the edge of the Brine Mixing Zone (as defined by the CA Ocean Plan; SWRCB 2015) for all scenarios modeled, which is estimated to be approximately 45 to 63 feet out from the diffuser for the Local Project and 70 to 98 feet for the Regional Project, and well below the salinity concentrations where any effects to planktonic organism have been documented.

Response MBCH3-93

The Draft EIR does in fact estimate potential impacts to planktonic organisms from impingement (Draft EIR page 5.11-49), entrainment (Draft EIR pages 5.11-49 through 5.11-54; Draft EIR Table 5.11-9), and potential discharge shear stress mortality (Draft EIR pages 5.11-58-5.11-60; Draft EIR Table 5.11-12). Impacts from shear stress and impingement and entrainment were not purposely “segmented”; they were analyzed in accordance with the OPA requirements. In the cases of entrainment and shear stress mortality, both impacts were assessed to be potentially significant unless mitigated. With the implementation of Mitigation Measure BIO-M2, which includes direct offsite ecological habitat enhancement or funding for offsite ecology habitat enhancement, the potential effects would be reduced to a less than significant level after mitigation.

Response MBCH3-94

The Draft EIR Appendix 11 evaluates the feasibility of constructing a brine discharge pipeline to Hyperion Water Reclamation Plant to co-mingle brine with the existing secondary-treated wastewater effluent. The study comports with the Ocean Plan Amendment requirements to evaluate the possibility of co-mingling brine with existing ocean discharges. The study concludes that the construction of a pipeline would be difficult, but technically feasible. However, the study concludes that future wastewater flows in the Hyperion outfall are not sufficiently reliable to support the dilution benefits associated with co-mingling. Furthermore, since the publication of the Draft EIR, the Mayor of the City of Los Angeles announced on February 21, 2019, that the City will recycle 100 percent of its wastewater by 2035, further assuring that any co-mingling of brine with wastewater at the Hyperion plant would be infeasible. As a result, significant alterations to the outfall diffuser would be required similar to the proposed outfall. And because West Basin does not own the Hyperion facility, the study concluded that it would be infeasible to obtain permission from the City of Los Angeles to retrofit the existing outfall to accommodate ocean water desalination brine. While, the benefits of co-mingling brine with wastewater effluent are to meeting water quality standards, little benefit is gained with regards to discharge entrainment and shear stress impacts. As such, West Basin has met the Ocean Plan’s requirements to investigate the feasibility of using existing outfalls to co-mingle brine and proposes to use a multi-port diffuser; see Final EIR Appendix 14.

Response MBCH3-95

The commenter's assertion that the potential effects of the Regional Project were determined to be less than significant on the basis that the impacts would be similar to those of the Local Project is incorrect. All of the potential effects of the Local and Regional Projects were assessed individually against baseline conditions. While the types of effects on marine habitats and ecosystems would be similar between the Projects, the magnitude of effects would differ. Specific to the commenter's example of the differences between the Local and Regional Project's salinity discharge, this is discussed in detail in Section 5.9, *Hydrology and Water Quality*, beginning in the Draft EIR on page 5.9-58, and Draft EIR Table 5.9-8, which presents information on the Regional Project relative to the brine discharge.

Response MBCH3-96

As discussed in Section 5.12.1, the proposed Project is located within the City of EL Segundo, which is subject to the El Segundo Municipal Code (ESMC) Section 7-2-10. Section D states the following:

Exemptions:

(D) Construction Noise: Noise sources associated with or vibration created by construction, repair, or remodeling of any real property, provided said activities do not take place between the hours of six o'clock (6:00) PM and seven o'clock (7:00) AM Monday through Saturday, or at any time on Sunday or a Federal holiday, and provided the noise level created by such activities does not exceed the noise standard of sixty five (65) dBA plus the limits specified in § 7-2-4C of this Chapter as measured on the receptor residential property line and provided any vibration created does not endanger the public health, welfare and safety.

As stated on page 5.12-6, "Although the Project is not in the city of Manhattan Beach, the El Segundo Generating Station (ESGS) South Site is located immediately adjacent to Manhattan Beach City limits and within 130 feet of residential units across 45th Street from the South Site. Accordingly, potential impacts to these Manhattan Beach residents are evaluated in light of Manhattan Beach's noise standards."

The Manhattan Beach Municipal Code (MBMC) Section 5.48.060, as well as Section 9.44.030, restricts construction to 7:30 a.m. and 6:00 p.m., Monday through Friday, and 9:00 a.m. and 6:00 p.m. on Saturdays. MBMC Section 5.48.250 exempts construction activities from the MBMC daytime standards.

Therefore, both the ESMC and MBMC limit construction to daytime hours Monday through Saturday. Even though the proposed Project itself is not located in Manhattan Beach, construction of the proposed Project would adhere to these allowable daytime hours for construction activities occurring within the El Segundo and Manhattan Beach jurisdictional boundaries, as required in Mitigation Measure NOI-1.

In addition, as stated on page 5.12-17, both El Segundo's and Manhattan Beach's noise ordinances exempt reasonable daytime construction noise. However, as is typical for construction

activities in proximity to residences, proposed Project construction noise would exceed the operational exterior noise standards for residential uses.

Implementation of Mitigation Measures NOI-1 through NOI-3 would lessen construction noise and ensure that impacts at sensitive receptors would be minimized. Mitigation Measure NOI-1 requires that construction equipment be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices. Mitigation Measure NOI-2 requires that West Basin provide a qualified “Noise Disturbance Coordinator” to respond to local complaints, should they arise. Mitigation Measure NOI-3 would require West Basin to investigate pile installation methods other than percussive pile driving and implement the alternative method if feasible.

Nevertheless, as stated on page 5.12-17, despite implementation of all feasible mitigation, and despite the fact that construction is exempt from the local noise ordinances, given the duration of construction and proximity to noise-sensitive receptors, and given the City of El Segundo’s and City of Manhattan Beach’s noise standards for residential uses that would be exceeded for an extended duration, construction of the Local Project with respect to noise impacts during construction is considered significant and unavoidable.

Response MBCH3-97

The Draft EIR identifies worst-case noise generation during specific construction activities in order to assess the maximum noise impact that could occur during construction. The loudest activities would not be occurring consistently over the 72 months for the Local Project, but may occur during extended periods. Mitigation Measures NOI-1 through NOI-4 have been established to minimize the noise impacts to local receptors, including limiting the duration of noise generating activities. However, the Draft EIR concludes in Tables 5.12-9 and 5.12-16 that construction noise may exceed thresholds of significance. As discussed on page 5.12-17, Mitigation Measure NOI-3 would require West Basin to investigate pile installation methods other than percussive pile driving and implement the alternative method if feasible. As discussed on page 5.12-22, Mitigation Measure NOI-2 which would be implemented for construction activities near local residences, requires that West Basin designate a qualified Noise Disturbance Coordinator who shall have the authority to require the installation of a temporary noise barrier to reduce noise impacts to the closest sensitive receptors. The noise barriers shall be tall enough to effectively block sight-lines of the construction to the closest residences. The contractor shall install noise barriers as directed by the Noise Disturbance Coordinator to minimize construction noise and resolve noise complaints.

However, despite implementation of all feasible mitigation, and despite the fact that construction is exempt from the local noise ordinances, given the duration of construction and proximity to noise-sensitive receptors, and given the City of El Segundo’s and City of Manhattan Beach’s noise standards for residential uses that would be exceeded for an extended duration, construction of the Local Project with respect to noise impacts during construction is considered significant and unavoidable.

Response MBCH3-98

West Basin is aware that construction noise may impact sensitive receptors, and it has committed to implementing all feasible mitigation measures for both the Local Project and Regional Project. The comment does not suggest any additional mitigation measures that West Basin could implement that would assist in further reducing or avoiding noise impacts. Mitigation Measure NOI-2 already requires West Basin to install noise barriers if needed to meet noise thresholds established by the City or if needed to reduce nuisance noise at nearby receptors. Mitigation Measure NOI-3 requires West Basin to implement drilling or vibratory methods to install piles if technically feasible. The Draft EIR recognizes that percussive pile driving may be the only method that can achieve the building safety standards needed to ensure compliance with the California Building Code (CBC). If this is the case, West Basin has prepared for the possibility and identified a significant and unavoidable impact of the project. This is not a deferral of mitigation or refusal to implement all feasible mitigation, but rather a recognition that final geotechnical data may determine that other methods are insufficient.

As stated in Mitigation Measure NOI-2, on page 5.12-22, throughout proposed Project construction and operation, West Basin shall document, investigate, evaluate, and attempt to resolve all Project-related noise complaints as soon as possible. For construction activities near local residences, the Noise Disturbance Coordinator shall have the authority to require the installation of temporary noise barriers to reduce noise impacts to the closest sensitive receptors. The noise barriers shall be tall enough to effectively block sight-lines of the construction to the closest residences. The contractor shall install noise barriers as directed by the Noise Disturbance Coordinator to minimize construction noise and resolve noise complaints. Noise barriers are effective only if it is feasible and technically possible to install a barrier of sufficient height and width that blocks the line-of-sight between the noise source and all potentially affected receptors. In addition, as discussed in Mitigation Measure NOI-3, West Basin shall determine the feasibility of using construction methods that avoid percussive pile driving. Other methods of pile installation such as vibratory or drilling shall be investigated during development of final designs and implemented if feasible.

Response MBCH3-99

The Draft EIR provides a detailed analysis of the potential for proposed construction methods to result in vibration that could damage structures. In an abundance of caution, the Draft EIR includes a Mitigation Measure NOI-5 that evaluates potential vibration effects of final construction methods and proximity to the existing structures and prohibits vibratory construction methods that are close enough to the storage tank to risk its structure integrity. This is not deferral, but rather a cautious measure to ensure the integrity of the storage tank.

Typical vibration levels produced by construction equipment are illustrated in Table 5.12-13, which identify a range of vibration levels at 25 feet for pile drivers both impact and sonic. Proposed Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedure and the construction equipment used. Construction equipment operations generate vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on structures located in the vicinity of the construction site

often varies depending on soil type, ground strata, and construction characteristics of the receiver structures. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels, to structural damage at the highest levels. Ground-borne vibrations from construction activities rarely reach levels that damage structures.

The closest structure on site would be the storage tank that could be within 25 feet of the pile driving activities. At this proximity, vibration could exceed structural damage thresholds for reinforced concrete or steel structures, as noted in Table 5.12-7. Because neither specific pile driving equipment nor a specific construction contractor has been selected, Mitigation Measure NOI-5 would require that West Basin evaluate whether pile driving installation activities within 100 feet of the existing storage tank located east of the ESGS site could damage the tank, which would depend on the specific pile driving equipment characteristics, as well as soil type, ground strata, and construction characteristics of the receiver structures. If vibration analysis concludes that construction methods could result in vibration beneath the tank that could result in structural damage, West Basin shall modify construction methods to ensure vibration would not be generated at levels that could damage the tank. The potential impact would only occur at the South Site Alternative. The Waste Management Plan that is required by Mitigation Measure HAZ-1 would include emergency contingencies to ensure full secondary containment of the storage tank is sufficient to avoid any risk of uncontrolled release from the tank.

In addition, during construction, Mitigation Measure NOI-5 requires West Basin to continue to monitor the storage tank for damage if construction activities occur within 25 feet of the tank. In response to this comment Mitigation Measure NOI-5 has been modified to ensure that if any damage is detected, all related construction activities must immediately stop and be modified to avoid further damage:

NOI-5: Prior to conducting sheet piling installation activities within 100 feet of the existing ~~Chevron~~ storage tank, West Basin shall conduct a vibration analysis of the local impact area to evaluate the potential for the construction methods to damage the tank. If vibration analysis concludes that construction methods could result in vibration beneath the tank that could result in structural damage, West Basin shall modify construction methods to ensure vibration would not be generated at levels that could damage the tank. ~~West Basin shall provide the assessment to Chevron for their review and comment.~~ West Basin shall monitor the existing ~~Chevron~~ storage tank for damage during construction activities within 25 feet of the tank. If damage from project-related vibration is detected, West Basin shall cease construction until methods are developed to avoid further damage and West Basin shall repair the damage.

Response MBCH3-100

The Draft EIR Section 5.12, *Noise*, analyzes the proposed Project's potential to affect both temporary (Impact NOI 5.12-4, page 5.12-31) and permanent (Impact NOI 5.12-3, page 5.12-28) ambient noise in the area. The Draft EIR identifies the ambient noise measurements (page 5.12-11) that were conducted at locations representative of typical existing noise exposure within and immediately adjacent to the desalination facility site and proposed conveyance system routes. The

ambient noise measurement location at the Strand and 45th street was selected to address potential noise impacts to the El Porto community in Manhattan Beach directly to the south of the proposed Project. The Draft EIR provides a detailed assessment of both construction and operational noise, concluding that construction noise could result in a significant and unavoidable impact of the project. Once constructed, noise impacts would be less than significant with mitigation applied. Operational noise impacts are analyzed on page 5.12-19.

As discussed in Impact NOI 5.12-1, noise from the desalinated water pump station and discharge pump station would be approximately 62 dBA without incorporating noise attenuation from enclosures, intervening structures, or topography, which could exceed Manhattan Beach's operational noise standards for residential uses. Mitigation Measure NOI-4 would require that West Basin incorporate acoustical treatments including enclosures for noise-generating machinery, which would achieve 40 dBA attenuation, to meet the nighttime noise standards for residential uses, which are lower than the daytime standards. Furthermore, as stated in Impact NOI 5.12-3, Mitigation Measure NOI-4 would require that West Basin design the facilities with acoustic treatments sufficient to meet local exterior noise standards. Mitigation Measure NOI-2 would require West Basin to monitor noise levels at the facility to ensure that the proposed Project does not exceed El Segundo's (Table 5.12-1) and Manhattan Beach's (Table 5.12-2) noise standards for residential uses. The Draft EIR notes that the closest residences may be 130 feet south of the enclosed pump station. Compliance with the noise ordinance standards would require that the facility control noise sources to levels below existing ambient levels. As shown in Table 5.12-6, the ambient noise level at the Strand and 45th Street is 59.3 dBA Leq. Therefore, with the incorporation of required mitigation measures, the proposed Project's contribution to the permanent ambient noise would not be perceptible, and impacts would be less than significant with mitigation. The Draft EIR complies with CEQA requirements to identify potential noise impacts associated with construction and operation and to propose mitigation measures that would ensure noise impacts are avoided or minimized through the establishment of measurable performance standards. See *Master Response: Environmental Impacts to the El Porto Community*.

Response MBCH3-101

As discussed in Section 3, *Project Description*, the proposed Project includes an initial desalination facility of 20 million gallons per day (MGD) of drinking water (Local Project) and the potential future expansion of the facility to produce up to 60 MGD (Regional Project). The Regional Project is inclusive of the Local Project, meaning that the assessment of noise impacts associated with the Regional Project includes the entirety of the combined facility at a project level. Project-level analyses examine all phases of a proposed project, including planning, construction, and operation, at a site-specific level, consistent with CEQA Guidelines Sections 15161 and 15378(a). The project-level EIR analysis is based on conservative assumptions, with the intent to sufficiently anticipate and address reasonably foreseeable potential environmental impacts. This EIR addresses appropriate aspects of the Regional Project (60 MGD) at a "programmatic level," pursuant to CEQA Guidelines Section 15168. While much of the Regional Project components are analyzed at a project-level, the Regional Project's details concerning design and operational characteristics have not been determined, and therefore, they cannot be

analyzed at the level of detail required for project-level analysis. The Regional Project would be collocated with the Local Project site (on either ESGS North or ESGS South). Once this Draft EIR environmental review process is complete, West Basin will consider whether to approve the Local Project. If the Local Project is approved, West Basin plans to pursue regulatory permits to implement the Local Project. If and when West Basin considers moving forward with the Regional Project (60 MGD), the specific designs that are known at that time could require subsequent project-level environmental review pursuant to CEQA Guidelines Section 15168(c).

As discussed on page 5.12-30, similar to the Local Project, operation of the Regional Project would generate noise within structures designed to minimize noise impacts to sensitive receptors. On-site activities associated with facility operation would be subject to Mitigation Measure NOI-2, ensuring that the facility would not increase ambient noise levels compared with existing conditions, and Mitigation Measure NOI-4, which would ensure that structures are designed with acoustic treatments sufficient to meet exterior noise standards. With implementation of mitigation, a less than significant impact would occur.

Response MBCH3-102

If the Chester Washington Golf Course is ultimately chosen as the location for the Regional Project pump station, West Basin will work with the County of LADPR to compensate for replacement of park space. The CEQA Guidelines questions analyzed in Section 5.14, *Recreation*, include 1) whether the proposed Project would increase the use of existing parks that would damage the recreational facilities or 2) whether the proposed Project would include recreational facilities or require expansion of recreation facilities that might have impacts on the environment. West Basin has appropriately analyzed these topics in Section 5.14. West Basin will coordinate with LADPR regarding any future use of the Washington Golf Course. See also Response to LADPR-1.

Response MBCH3-103

The agencies responsible for permits, approvals and regulatory requirements are listed in the Draft EIR Table 3-11. The same table also lists the required permits or approvals, and for what activity or component the permit or approval would be required.

Response MBCH3-104

As explained in Impacts REC 5.14-1 (pages 5.14-7 and 5.14-8) and TRA 5.15-6 (pages 5-15-33 and 34), application of Mitigation Measures REC-1 and TRA-1 would provide for local agency coordination around bicycle path disruptions, and establishment of appropriate detours and associated signage during periods of closure. Thus, with these measures implemented, any closures of the bike routes identified in Figure 5.14-1 would be accompanied by bike path detours during construction.

Response MBCH3-105

Impacts associated with rerouting the Marvin Braude Bike Trail during construction are addressed in Section 5.14, *Recreation* and Section 5.15, *Transportation and Traffic*. As discussed on pages 5.14-7 and 5.15-33, work immediately adjacent to the Marvin Braude Coastal Bike Trail

would occur for a period of several weeks. As currently envisioned, use of the bike trail could be disrupted for a period of several weeks during the 5-year construction period. As explained in Impacts REC 5.14-1 (pages 5.14-7 and 5.14-8) and TRA 5.15-6 (pages 5.15-33 and 34), application of Mitigation Measures REC-1 and TRA-1 would provide for local agency coordination around bicycle path disruptions, and establishment of appropriate detours and associated signage during periods of closure. Thus, with these measures implemented, any closures of the subject trail would be accompanied by instructions regarding safe alternative routes.

Mitigation Measures REC-1 and TRA-1 apply to all bike routes that could be impacted by proposed Project construction as identified in Figure 5.14-1.

Response MBCH3-106

The analysis in Draft EIR Section 5.15, *Transportation and Traffic* (Impact TRA 5.15-1), examines the potential for the proposed Project to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The discussion considers numerous local policies and regulations (specified in Subsection 5.15.1, *Regulatory Framework* and Subsection 5.15.3, *Significance Criteria and Thresholds*), and does not address those of individual jurisdictions specifically. Nevertheless, for the reasons presented in the Draft EIR, and summarized below, the analysis addresses and concludes the proposed Project would not conflict with applicable Manhattan Beach General Plan provisions.

In the discussion of potential construction impacts (Impact TRA 5.15-1; pages 5.15-17 through 5.15-22; 5.15-23 through 5.15-24), the Draft EIR acknowledges that the proposed Project would increase worker and truck trips on local roadways during the construction period. To minimize the effect of additional traffic on local roadways during construction, including traffic which could conflict with the policies and regulations of local jurisdictions, the Draft EIR recommends Mitigation Measures TRA-1 and TRA-2, which call for preparation and implementation of a traffic control plan and parking and staging plan. The traffic control plan would be required to address several construction traffic issues, including timing of materials deliveries, lane closures and detours, specify haul routes, and preservation of emergency service provider access, among other measures to reduce local construction traffic impacts. The parking and staging plan would require that all proposed Project-related parking occur on-site or in predesignated off-site proposed Project areas, among other measures (page 5.15-26). The Draft EIR concludes that with these measures, proposed Project construction would have a less than significant impact with respect to plans and policies establishing measures of effectiveness for the performance of the circulation system.

Similarly, the Draft EIR's discussion of operational impacts on traffic explains proposed Project operations would result in a nominal increase in local traffic, which would not significantly impact the level of service on areas roadways. The analysis concludes that, without mitigation, proposed Project operations would have a less than significant impact with respect to plans and policies establishing measures of effectiveness for the performance of the circulation system (Impact TRA 5.15-1; pages 5.15-22 through 5.15-23; 5.15-25 through 5.15-26).

Therefore, while the impact discussion does not include specific consistency findings with respect to individual provisions of specific local government policies and regulations concerning traffic and transportation, the impact discussion draws upon the requirements presented in Subsection 5.15.1, *Regulatory Framework*, and standards presented in Subsection 5.15.3, *Significance Thresholds and Criteria*, in evaluating and concluding whether the proposed Project would conflict with any such requirement. Table 5.10-3 summarizes the proposed Project's consistency with the Coastal Act, Sea Level Rise Policy Guidance, and El Segundo LCP plans, policies, and regulations. For the reasons presented, the proposed Project would not conflict with Manhattan Beach goals or policies related to the performance of the circulation system.

Response MBCH3-107

As discussed in Draft EIR Section 5.14, *Recreation* (page 5.14-7) and Section 5.15, *Transportation and Traffic* (Impact TRA 5.15-6; page 5.15-33), work immediately adjacent to the Marvin Braude Coastal Bike Trail could occur for a period of several weeks. As currently envisioned, use of the bike trail could be disrupted for a period of several weeks during the 5-year construction period. As explained in Impacts REC 5.14-1 (pages 5.14-7 and 5.14-8) and TRA 5.15-6 (pages 5-15-33 and 34), application of Mitigation Measures REC-1 and TRA-1 would provide for local agency coordination around bicycle path disruptions, and establishment of appropriate detours and associated signage during periods of closure. Thus, with these measures implemented, any closures of the subject trail would be accompanied by instructions regarding safe alternative routes, which would not include forcing trail users onto the sand.

Response MBCH3-108

The Draft EIR includes provisions in the Project Description that indicate worker trips would occur prior to 7 AM and either before 4 PM or after 6 PM. This is based on the need to begin and end construction at the allowable hour each day to maximize construction time. Additionally, the Traffic Control Plan required under Mitigation Measure TRA-1 will "identify need for construction work hours and arrival/departure times outside of peak traffic periods."

Response MBCH3-109

The Draft EIR presents two options for sewer connection, the City of Manhattan Beach and the City of El Segundo. West Basin will work with both entities regarding the potential sewer connection. Impacts of both connections are adequately addressed in the Draft EIR on page 5.16-16 respective to Utilities. West Basin will work with either city to procure all necessary permits and approvals.

Response MBCH3-110

The goal of the proposed Project is to reduce reliance on imported water and improve water reliability and security in an environmentally responsible manner. Phase 1 of the Project identifies 21,500 AFY as a target amount that could be increased to 60,000 AFY in a Regional Project in the future. Since West Basin's future demands are generally similar to existing demands (see Draft EIR on page 2-15), the amount of water provided by ocean water desalination would directly reduce the need for imported water. As stated in the Draft EIR on page 6-8 and 6-9,

“While the Project would provide a new water source within West Basin’s service area, it would replace imported water distribution through the service area and therefore would not induce future growth. Rather, as a project to support future reliability by creating a new local water source, the Project would accommodate existing demand and a very small (0.4 percent) annual increase in demand such that water infrastructure reliability would not be an impediment to already planned growth.” The Draft EIR therefore concludes that proposed Project neither supports nor encourages growth within West Basin’s service area to a greater degree than presently estimated by the 2015 UWMP and land use agencies with jurisdiction over the proposed Project area. See EIR Section 6, Other CEQA Considerations, specifically Section 6.2.3 Population Growth.

Contrary to the commenter’s interpretation of the language presented on page 6-9 on the Draft EIR, (“...the Project would be implemented in phases to ensure the new supply is appropriately keeping up with population growth”), the Regional Project would only be implemented as necessary to meet projected water demands (imported or locally-produced) consistent with the demographic forecasts developed by Southern California Association of Governments. In fact, the 21,500 AFY of potable water to be produced by the Local Project is in direct response to the 20,342 acre-foot shortfall that West Basin’s 2015 Urban Water Management Plan (2015 UWMP; West Basin 2016) identifies would be experienced in a multiple-dry year event. See *Master Response: Water Supply Alternatives*.

Response MBCH3-111

The demolition of existing NRG Units 3 and 4 are analyzed throughout the EIR where impacts would result from this particular activity. Where different, impacts associated with the North Site and South Site are distinctly analyzed in the Draft EIR (oftentimes with distinct headings). The example provided by the commenter is accurate because as stated in the Draft EIR on page 5.14-7, the demolition of Units 3 and 4 would occur entirely within the ESGS site perimeter and would not interfere with nearby recreational activities. This is clearly not applicable to the South Site, where demolition of existing units would not occur and is not applicable to the analysis.

Response MBCH3-112

See response to comment MBCH3-94.

Response MBCH3-113

As stated in the Draft EIR in Subsection 7.3.4 on page 7-55, the Reduced Elevation – South Site Plan Alternative would reduce the significance level of aesthetic impacts by minimizing the aesthetic impact to neighboring residential land uses. While this alternative reduces the aesthetic impact, it does not reduce any of the significant and unavoidable impacts identified in the Draft EIR to air quality or noise.

Regarding the commenter’s assertion that the Draft EIR be revised to include more alternatives that reduce potentially significant impacts, West Basin has done its due diligence per CEQA Guidelines Section 15126.6(b) to choose a range of reasonable alternatives that focus on “substantially lessening” any significant effects of the proposed Project, which this alternative does with respect to aesthetic impacts, which will be significantly reduced to neighboring residential land uses.

Response MBCH3-114

The Draft EIR's discussion of the environmentally superior alternative clearly states that the No Project Alternative is the environmentally superior Alternative to the proposed Project. CEQA Guidelines section 15126.6(e)(2) states if the environmentally superior alternative is the 'no project' alternative, the EIR should identify an environmentally superior alternative among the other alternatives analyzed. Consistent with this requirement, the Draft EIR concludes on page 7-59 that the proposed Project would be environmentally superior to the other Alternatives analyzed. For clarity, the EIR goes on to conclude that the North Site is environmentally superior to the South Site. No additional information is needed to comply with CEQA regarding identification of an environmentally superior project Alternative.

Response MBCH3-115

See response to comment MBCH3-1.

Response to Letter RBCH: City of Redondo Beach

Response RBCH-1

While West Basin appreciates the comment, it expresses an opinion and does not specify any deficiencies in the analysis included in the Draft EIR. As a result, this comment has been noted for the record and no further response is necessary; see *Master Response: Non-CEQA Issues*.

Response RBCH-2

The Draft EIR discusses the proposed Project's use of energy in Section 5.5, *Energy*, in Section 5.7, *Greenhouse Gas Emissions*, and marine resources are discussed in Section 5.11, *Marine Biological Resources*. As noted throughout the Draft EIR, West Basin continues to include conservation as an integral component of its water supply portfolio and West Basin's recycled water sales are anticipated to increase in the future, even in the No Project Alternative. West Basin acknowledges the City's position that West Basin should provide recycled water to every business and residence in Redondo Beach. But it is unclear what 250 MGD of nearby discharge water referred to in the comment could be put to beneficial use. See response to comment HTB-37 and *Master Response: Water Supply Alternatives*.

Response RBCH-3

This comment does not address the environmental effects of the proposed Project; Draft EIR Subsection 7.2.1 discusses the current status of regulations addressing the direct use of recycled water for all non-potable uses.

Response RBCH-4

The Draft EIR Subsection 7.3.2 explains that the AES Generating Station in Redondo Beach has a long history of controversy regarding future land uses and local residents' desire to see open space uses or redevelopment for tourism and economic benefit, and discloses that the City was working with AES on selling the property; therefore, its availability for West Basin use is uncertain at this time. Nevertheless, given the extensive prior evaluation of this site and the amount of land potentially available, this alternative is evaluated as an alternative in Section 7.

Response RBCH-5

The commenter's opposition to the desalination facilities at both the El Segundo and the Redondo Beach locations are noted for the record. See *Master Response: Non-CEQA Issues*.

Response RBCH-6

Responses to comments provided by the City of Redondo Beach as Exhibit A are included in response to comments RBCH-7 through RBCH-14.

Response RBCH-7

The Draft EIR Subsection 7.2.1 considered 11 alternatives, including increased conservation, stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse (see Draft EIR Table 7-1). See also response to comment CULV-10 and *Master Response: Water Supply Alternatives*.

Response RBCH-8

As outlined in Draft EIR Section 5.11, *Marine Biological Resources*, there is a wide variation in the estimated magnitude of entrainment and therefore ecosystem effect. It is precisely for this reason that Mitigation Measure BIO-M2 commits West Basin to mitigating potential entrainment impacts of the proposed Project with ecosystem enhancement efforts. This measure also proposes to conduct a study of the operation under real-world conditions to assess the magnitude of potential impact. Further, Mitigation Measure BIO-M2 was developed specifically to clarify the impact of the proposed Project's ocean intake and discharge on marine productivity and to provide commensurate ecological enhancement and improvement to offset any effects of the proposed Project on marine productivity, as required by CEQA, and therein reducing the potential effects of Project related entrainment to less than significant.

In terms of the two mitigation opportunities referenced by the commenter, as stated within the text of Mitigation Measure BIO-M2, "If elected by the Project, habitat restoration will occur at a location of sufficient marine acreage or alternative coastal lagoon/estuary acreage (e.g. Ballona Wetland Restoration Project), and in a manner acceptable to the RWQCB as part of the Project's permitting process." While the Ballona site is mentioned, the final decision on location will be "determined by the RWQCB with consideration for: (1) existing level of wetland function at the site prior to mitigation; (2) resulting level of wetland function expected at the mitigation site after the proposed Project is fully successful; (3) length of time before the mitigation is expected to be fully successful; (4) risk that the mitigation project may not succeed; and (5) differences in the location of the lost wetland and the mitigation wetland that affect the services and values they have the capacity and opportunity to generate, consistent with the OPA."

Response RBCH-9

In response to the comment providing updated information about the Waterfront Development Project's approval by the Redondo Beach City Council and pending review of the California Coastal Commission, the Draft EIR text on page 4-5 is revised as follows:

City of Redondo Beach

Waterfront Development Project (Portofino Way and Torrance Circle)	Demolition of approximately 207,402 SF of existing structures Retention of 12,479 SF of existing development Construction of up to 511,460 SF of retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel Total of new and remaining development on-site would be 523,939 SF (304,058 SF of net new development) Status: Application being processed, NOP circulated June-July 2014 <u>Approval by City Council, under review by California Coastal Commission, construction anticipated 2017-2020 2019-2021.</u>
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Response RBCH-10

In response to the comment providing updated information about the South Bay Galleria Improvement Project, which was approved by the Planning Commission on April 19, 2018 and is on appeal to the City Council, the Draft EIR text on page 4-6 is revised as follows:

23	South Bay Galleria Improvement Project (1815 Hawthorne Boulevard)	<p>Increase existing SF by 217,864 SF, including department stores, mall shops, dining and entertainment.</p> <p>Overall density of development on the site (including retail, office, hotel, and housing) will increase to a maximum 1,943,965 sf of building floor area.</p> <p>Project will also include a hotel of up to 150 rooms and up to 300 650 DU (townhomes, condos, and/or apartment homes).</p> <p>Status: NOP posted October 2015 <u>Approved by Planning Commission on April 19, 2018 and on appeal to the City Council, construction anticipated 2017-2018-2020-2023</u></p>
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Response RBCH-11

In response to new information about cumulative project number 24, the Draft EIR text on page 4-6 is modified as follows:

24	Mixed-Use Development (1700 South Pacific Coast Highway)	<p>149 115 DU</p> <p>2637,000 SF of commercial</p> <p>Status: <u>Approved June 2016, construction to begin in 2019 completed 2017</u></p>
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Response RBCH-12

In response to new information about cumulative project 25, the Draft EIR text on page 4-6 is revised as follows:

25	600 North Pacific Coast Highway	<p>Expansion of existing automobile sales office/lot with adjacent property at 610 N. Pacific Coast Highway</p> <p>Status: Initial project development stage <u>Project under construction in 2019</u></p>
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Response RBCH-13

Mitigation Measure TRA-1 requires West Basin to prepare a Traffic Control Plan, which will identify temporary travel lane closures and truck routes. As indicated in the Draft EIR in Table 3-11 on page 3-41, West Basin will be required to obtain an encroachment permit from the City of Redondo Beach prior to construction. West Basin will communicate with the City of Redondo Beach regarding lane closures within its jurisdiction.

Response RBCH-14

See response to comment RBCH-4.

Response to Letter LADPR: Los Angeles County Department of Parks and Recreation

Response LADPR-1

As discussed in the Draft EIR on page 2-3, this EIR addresses some aspects of the Regional Project (60 MGD) at a “programmatic level,” pursuant to CEQA Guidelines Section 15168. A program-level analysis allows a public agency to evaluate the effects of a series of actions that are related geographically and as logical parts in a chain of contemplated actions, as is true for the Local and Regional Projects. The pump station is a Regional Project feature, and would be constructed by West Basin after the Local Project is implemented, and after the year 2026. While much of the Regional Project components are analyzed at a project-level, some of the Regional Project’s details concerning design and operational characteristics have not been determined, and therefore, they cannot be analyzed at the level of detail required for project-level analysis. The 5,000-square foot pump station site is proposed to be constructed on the Chester Washington Golf Course, and impacts have adequately been analyzed in the Draft EIR at a programmatic level based on the information available at the time the Draft EIR was released. Additionally, the commenter’s request that information about how the land will be acquired, assessed, and used, be included in the Draft EIR, is outside of the scope of the CEQA analysis. If the site is still being considered at the time the Regional Project is built, West Basin will coordinate with the County of Los Angeles Department of Parks and Recreation (LADPR) regarding acquisition, access, and use.

Response LADPR-2

If the Chester Washington Golf Course is ultimately chosen as the location for the Regional Project pump station, West Basin will work with the County of LADPR to compensate for removal of green space, per the Park Preservation Act, as appropriate. The CEQA Guidelines questions analyzed in Section 5.14, *Recreation*, include 1) whether the proposed Project would increase the use of existing parks that would damage the recreational facilities or 2) whether the proposed Project would include recreational facilities or require expansion of recreation facilities that might have impacts on the environment. West Basin has appropriately analyzed these topics in Section 5.14. West Basin will coordinate with LADPR regarding any future use of the Washington Golf Course. See also Response to LADPR-1.

Response LADPR-3

West Basin reviewed the *Historic Resources Evaluation for the Chester Washington Golf Course* provided by the commenter, and notes that the Chester Washington Golf Course is eligible for listing on the California Register of Historical Resources (CRHR) and the County of Los Angeles Register of Landmarks and Historic Districts. The Draft EIR, beginning on page 5.4-31, discusses the Regional Project desalinated water conveyance components impacts for historical resources. This section has been updated to consider historical resources identified after certification of the EIR, but before proposed Project construction. A new mitigation measure, Mitigation Measure CUL-12, has been incorporated for the Regional Project’s desalination water conveyance components. This mitigation measure requires the preparation of a historical resources assessment prior to implementation of the Regional Project. The assessment will identify historic

architectural resources that may be directly or indirectly impacted by the Regional Project, including the golf course and associated facilities that are eligible for listing on the CRHR, and will provide treatments to avoid or reduce potential impacts. The Draft EIR text is modified on page 5.4-32 as follows:

Desalinated Water Conveyance Components

As noted above in the Local Project Impact CUL-5.4-1 discussion, no known historical resources were identified within the proposed desalinated water conveyance components as a result of the records search and survey. However, the geoarchaeological review indicates that the sediments underlying the eastern portions of the water conveyance components have the potential to contain buried archaeological deposits that may qualify as historical resources. Therefore, construction of the offshore and onshore portions of the ocean intake and concentrate discharge structures has the potential to encounter subsurface archaeological deposits that qualify as historical resources, resulting in a significant impact. Implementation of Mitigation Measures CUL-1 through CUL-5 would be required to ensure that the Project's potential impacts to archaeological resources that may qualify as historical resources are less than significant.

Because the phasing of the Regional Project is unknown at this time, additional historic architectural resources that qualify as historical resources may be identified as part of separate projects within and/or adjacent to the desalinated water conveyance components. Should additional historical resources be identified in the future, construction of the Regional Project's desalination water conveyance components could directly or indirectly impact these resources. Implementation of **Mitigation Measure CUL-12** would be required to ensure that the Project's potential impacts to historic architectural resources that may qualify as historical resources are less than significant.

Mitigation Measures:

Implement Mitigation Measures CUL-1 through CUL-5 and CUL-12 for impacts to historical resources resulting from construction of the ocean water desalination facility and the desalination water conveyance components.

CUL-12: Prior to development of the Regional Project's desalination water conveyance components, West Basin shall retain a qualified architectural historian to conduct a historical resources assessment. All identified historic architectural resources shall be assessed for the Regional Project's potential to result in direct and/or indirect impacts to those resources, and any historic architectural resource that may be affected shall be evaluated for potential significance (i.e., listing in the CRHR) prior to West Basin's approval of Project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations for avoiding or minimizing impacts, or for the treatment of historical resources that will be impacted by the Regional Project. West Basin shall implement the recommendations.

Response LADPR-4

The proposed Project does not anticipate the removal of trees requiring a removal permit. Avoidance of trees as well as necessary permitting should a tree require removal is discussed on pages 5.3-47 through 5.3-49. Tree removal permit requirements are discussed on page 5.3-9.

Response LADPR-5

The proposed Regional Pump Station would be a small structure that would not have the potential to significantly impact views or change the character of the surrounding area including the golf course. While design of the pump station has not yet been completed, pump stations are typically one-story shed-like structures. Final designs would ensure that access to the golf course is not impeded. As with other proposed Project facilities, the Regional Pump Station would be required to comply with mitigation measures to reduce aesthetic impacts including Mitigation Measure AES-1 to screen construction staging areas, Mitigation Measure AES-3 requiring enclosures to be compatible with adjacent structures, and Mitigation Measure AES-7 requiring that structures visible to the public be painted to minimize visual intrusion.

West Basin will coordinate with the owner of the land on which the Regional Pump Station is proposed, in order to acquire the land and to ensure ongoing operation of adjacent facilities such as recreation areas.

Response LADPR-6

West Basin acknowledges that the Los Angeles County Department of Public Works manages the Marvin Braude Bike Trail. In response to the comment, the Draft EIR text in Table 3-11 on page 3-41 is revised as follows:

L.A. County Parks Los Angeles County Department of Public Works

Encroachment Permit

May be required for temporary ESGS seawall work along Marvin Braude Bike Trail.

Response LADPR-7

LADPR requested a typographical change to the Draft EIR Section 5.14, Recreation. In response to the comment, the Draft EIR text on page 5.14-6 is revised as follows:

- Regional Pump Station Optional Site 5, which is sited within the westernmost edge of the Chester Washington Golf Course in unincorporated Los Angeles County.

Response LADPR-8

West Basin notes the Los Angeles Department of Parks and Recreation's contact information for any future correspondence regarding this comment letter.

Response to Letter LADWP: Los Angeles Department of Water and Power

Response LADWP-1

West Basin notes the Los Angeles Department of Water and Power's (LADWP) mission. A response regarding power resources are addressed in response to comment LADWP-2.

Response LADWP-2

The Draft EIR Figure 3-21 shows the proposed offsite staging areas. The note on the figure acknowledges that "offsite staging areas are preliminary, subject to change during final design and construction." Although West Basin appreciates the comment, space availability at Scattergood may change in the future; therefore, no change has been made to the EIR.

Response LADWP-3

West Basin notes the LADWP's contact information for any future correspondence regarding this comment letter.

Response to Letter LASAN: Los Angeles Bureau of Sanitation

Response LASAN-1

If West Basin chooses the sewer infrastructure option within the jurisdiction of the City of Los Angeles Department of Sanitation (LASAN), West Basin will coordinate with the City appropriately.

Response LASAN-2

West Basin notes the LASAN's contact information for any future correspondence regarding this comment letter.

Response to Letter MWD: Metropolitan Water District of Southern California

Response MWD -1

West Basin appreciates the Metropolitan Water District of Southern California's (MWD's) role as a regional wholesale water provider, its understanding of the proposed Project, its commitment to water use efficiency, and its support for desalination as a new, additional, local water supply, as demonstrated by the Seawater Desalination Program Agreement it entered into with West Basin in March 2006 (Agreement No. 70023; MWD 2006). Under the terms of that agreement (Sections 2.3 and 2.4), West Basin will provide MWD (as a responsible agency under CEQA), with the necessary environmental documentation to support the proposed project, including a detailed project description.

As noted on Draft EIR page 3-14, new conveyance infrastructure would convey product water from the Local Project desalination facility to the existing distribution system that delivers potable water to local area distribution systems, and to regional supply feeders owned by MWD. The closest regional potable water feeder system is MWD's West Basin Feeder located within Manhattan Beach Boulevard and the West Coast Feeder located within El Segundo Boulevard. Both of these regional feeders are fed by the MWD Sepulveda Feeder, which is located within the north-south Van Ness Avenue. The locations of existing MWD facilities are shown in Draft EIR Figure 3-5.

Several conveyance alignment alternatives may be used to convey desalinated water from the proposed desalination facility to the MWD Feeder System as well as to local water retailers' distribution systems, as shown in Figure 3-5. The Draft EIR describes on page 3-14 that from the desalination facility, the new pipeline route would head north on Vista del Mar Boulevard, then slightly east on Grand Avenue, and continue east along El Segundo Boulevard to the intersection with Aviation Boulevard. Conveyance option alternative alignments could potentially include parallel alignments continuing along Grand Avenue, along Franklin Avenue, or through Chevron's property. From the intersection of Grand Avenue and Aviation Boulevard, the proposed conveyance pipeline alignment would travel north on Aviation Boulevard to West 120th Street, where it would turn east and connect to the MWD Feeder at Van Ness Avenue. To connect the desalinated water conveyance pipeline to the west end of the existing West Basin Feeder, a pipeline would travel south on Inglewood Avenue from West 120th Street to Manhattan Beach Boulevard. Additionally, pipeline alternative alignments would be routed through various alternative routes to connections along the existing West Basin and West Coast Feeders.

In response to this comment, the text on Draft EIR page 3-2 is revised as follows:

Potable water produced at the facility would be conveyed to the existing local water distribution system through a new conveyance system. The new conveyance system would connect to the local distribution system serving the cities of El Segundo, Redondo Beach, Lawndale, Gardena, and Hawthorne and portions of unincorporated Los Angeles County, and/or MWD's feeder system.

West Basin is currently focused on the Local Project that may convey product water to either the local retailers' distribution systems or to MWD's Feeder System. The full details of the Regional Project's design and operational characteristics have not been determined at this time.

As acknowledged in Draft EIR Table 3-11, West Basin would need to coordinate with MWD in the event the Regional Project is pursued. A partnership with MWD would be required and West Basin would enter into a Wheeling Agreement for use of MWDs conveyance route to transport the potable water produced from the desalination process to the West Basin service area retailers. An encroachment permit would also be required for any West Basin facilities that would be adjacent to MWD's facilities or MWD's rights of way. West Basin appreciates receiving the compatibility Guidelines for Developments in the Area of Facilities.

Response to Letter SCAQMD: South Coast Air Quality Management District

Response SCAQ-1

Responses to comments provided by the South Coast Air Quality Management District (SCAQMD) are included in response to comments SCAQ-2 through SCAQ-6.

Response SCAQ-2

West Basin acknowledges the brief summary of the Project Description provided by the commenter.

Response SCAQ-3

West Basin thanks the SCAQMD for the information regarding the SCAQMD General Conformity review process. A discussion of General Conformity is addressed in the Draft EIR starting on page 5.2-25 in the *Federal Conformity Analysis for SRF (CEQA Plus)* section. As stated, the proposed Project meets the conformance criteria under 40 C.F.R. section 93.158(5)(v) for conformance applied to regional water supply projects. Therefore, conformity is established by the nature of the Project. Since the Project is in conformance it would not utilize the general conformity emissions credits included in the 2012 AQMP. See response to comment MBCH3-23.

Response SCAQ-4

Draft EIR Table 3-11 lists the SCAQMD as an agency responsible for issuing a permit to construct the desalination facility, and a permit to operate any backup sources of power such as emergency generators.

Response SCAQ-5

West Basin will provide written responses to comments to commenting agencies in accordance with CEQA Guidelines Section 15088.

Response SCAQ-6

West Basin notes the SCAQMD's contact information for any future correspondence regarding this comment letter.

Response to Letter SCG: Southern California Gas Company

Response SCG-1

West Basin will coordinate with the Southern California Gas Company when the proposed Project is designed to ensure construction does not interfere with any of the high pressure gas lines mentioned in the comment.

Response to Letter SCG2: Southern California Gas Company

Response SCG2-1

Responses to comments provided by the Southern California Gas Company are provided in responses to comment SCGS2-2 through SCGS2-4.

Response SCG2-2

Please see response to comment SCG-1.

Response SCG2-3

Please see response to comment SCG-1. Per normal construction protocol, West Basin's construction contractor will contact Underground Service Alert to make sure underground utilities are marked.

Response SCG2-4

Please see response to comment SCG-1.