

# SECTION 17

## Individual Comments and Responses

### 17.1 Individual

The following comment letters were received from individuals 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 17-1**.

**TABLE 17-1**  
**LIST OF DRAFT EIR COMMENT LETTERS: INDIVIDUAL**

<b>Letter Code</b>	<b>Commenting Party</b>	<b>Letter Page Number</b>	<b>Response Page Number</b>
ABD	Abdelnur, Diego	17-7	17-251
ADA	Adams, Gladi	17-8	17-252
AFF	Affonso, Jane	17-9	17-253
AHE	Ahearn, Grant and Lynn	17-10	17-254
ALV	Alvarez, Jose and Liz	17-11	17-255
ANO	Anonymous	17-12	17-256
ARE	Arensdorf, Karen	17-13	17-257
ASH	Ashouri, Aida	17-14	17-258
BAC	Bachelor, Laura	17-17	17-261
BAR	Barisa, Bart	17-18	17-262
BAUJ	Baumann, James	17-19	17-263
BAUL	Baumann, Liane	17-20	17-264
BECB	Becker, Bill	17-21	17-265
BECD	Becker, Richard	17-22	17-266
BES	Beswick, Paul	17-24	17-267
BOO	Boone, Peter	17-26	17-269
BOR	Boroch, Frank	17-27	17-270
BRAD	Brady, Theresa	17-28	17-271
BRAI	Braitman, Samuel J.	17-31	17-273
BRAU	Braunecker, Bonnie	17-32	17-274
BRAU2	Braunecker, Bonnie 2	17-33	17-275
BRI	Bringleston, Niklas	17-34	17-276
BUE	Bueltel, Michelle	17-35	17-277

<b>Letter Code</b>	<b>Commenting Party</b>	<b>Letter Page Number</b>	<b>Response Page Number</b>
CHA	Chang, Peter	17-36	17-278
CHR	Christopher, D.	17-37	17-279
CLA	Clayton, Ben	17-38	17-280
COC	Cochran, Brian	17-39	17-281
COC2	Cochran, Brian 2	17-41	17-282
COHJ	Cohen, Julia	17-42	17-283
COHS	Cohen, Stephen	17-43	17-284
CON	Constant, Terry	17-44	17-285
CROC	Croce, Renee	17-45	17-286
CROF	Croft, Amy	17-46	17-287
CUN	Cunningham, Glenn E.	17-47	17-288
DAV	Davidov, Thomas	17-49	17-290
DEF	DeFrank, Victoria Lynn	17-50	17-291
DEL	Delk, Patricia	17-51	17-292
DOD	Dodd, Clinton D.	17-52	17-293
DOL	Doll, Dina	17-53	17-294
DUN	Dunlap, Lesley	17-54	17-295
DUN2	Dunlap, Lesley 2	17-55	17-296
EVE	Everts, Conner	17-56	17-297
FEA	Feakins, Sarah	17-59	17-298
FER	Ferniany, Michael	17-64	17-305
FON	Fontana, Barbra	17-65	17-306
FOR	Forrest, Christopher	17-66	17-307
FRAN	Francois, Dean	17-67	17-308
FRAN2	Francois, Dean 2	17-68	17-309
FRAS	Fraser, Robert	17-69	17-310
FREE	Freeman, Robert	17-70	17-311
FREG	Frego, Scott	17-71	17-312
GAL	Gallman, Robert	17-73	17-315
GILM	Gilmer, Carrie	17-74	17-316
GIL	Gilmour, Steve	17-75	17-317
GIL2	Gilmour, Steve 2	17-76	17-318
GRA	Grant, Margaret	17-77	17-319
GUR	Gurewitz, David	17-78	17-320
GUT	Gutierrez, Felipe	17-79	17-321
HARD	Hardin, Mary	17-80	17-322
HAR	Harris, Susan	17-81	17-323
HIR	Hirsch, Emanuel	17-82	17-324
HOP	Hopwood, Marsha	17-84	17-325
JASJ	Jasaitis, Jay	17-85	17-326

<b>Letter Code</b>	<b>Commenting Party</b>	<b>Letter Page Number</b>	<b>Response Page Number</b>
JASJ2	Jasaitis, Jay 2	17-86	17-327
JASM	Jasaitis, Maria Dalia Sofija	17-87	17-328
JOH	Johnson, Dave	17-88	17-329
KAR	Karen	17-89	17-330
KEL	Keller, Harry E.	17-90	17-331
KEN	Kendall, Rebecca	17-91	17-332
KER	Kernan, Lindsey	17-92	17-333
KLA	Klafter, Aaron	17-93	17-334
KLI	Klink, Karen	17-94	17-335
KRE	Kreger, Michael	17-95	17-336
LEL	Lelchuck, Andrew	17-96	17-337
LIB	Libbey, Thomas	17-97	17-338
LOM	Lombard, David	17-98	17-339
LON	London, Janet	17-99	17-340
MAGG	Maggay, Kevin	17-100	17-341
MAGI	Magiawala, Dr. Kiran R.	17-102	17-343
MAL	Malpee, Peggy	17-103	17-344
MARA	Marron, Andrea	17-104	17-345
MARA2	Marron, Andrea 2	17-105	17-346
MARJ	Marron, Joseph	17-106	17-347
MAS	Mason, Allan	17-107	17-348
MATL	Matlosz, Shawn	17-108	17-349
MATT	Matthes, Ella	17-109	17-350
MCM	McManis, Craig	17-110	17-351
MCM2	McManis, Craig 2	17-111	17-352
MCP	McPherson, Rachel	17-112	17-353
MER	Merkin, Arthur	17-113	17-355
MIC	Michel, Suzanne	17-114	17-356
MILZ	Miller-Zarneke, Tracey	17-115	17-357
MILE	Miller, Emmett	17-117	17-359
MILM	Millington, Manuela	17-118	17-360
MIT	Mitchell, Jane	17-119	17-362
MOE	Moe, Annelisa	17-120	17-363
MOI	Moir, Elizabeth	17-122	17-364
MOO	Moore, Lynne	17-123	17-365
MURE	Murillo, Esteban	17-126	17-373
MURS	Murillo, Steve	17-127	17-374
MURS2	Murillo, Steve 2	17-128	17-375
MURS3	Murillo, Steve 3	17-129	17-376

<b>Letter Code</b>	<b>Commenting Party</b>	<b>Letter Page Number</b>	<b>Response Page Number</b>
MUP	Murphy Perkins, Bob & Michelle	17-130	17-377
MYE	Myers, Frank	17-133	17-384
NEA	Neal, Jan	17-134	17-385
NEE	Neel, Sean	17-137	17-392
NEL	Nelson, Tennyson	17-138	17-393
NOL	Nolan, Phoebe	17-139	17-394
NOR	Norrie, William Robert	17-140	17-395
ORA	Oram, Kelly	17-141	17-396
ORT	Ortega, Evan	17-142	17-397
PAN	Pancake, Jerry	17-143	17-398
PAN2	Pancake, Jerry 2	17-144	17-399
PAR	Parker, Kathleen	17-145	17-400
PER	Perelson, Cindy	17-147	17-401
PHE	Phelps, Andrew	17-148	17-402
PHE2	Phelps, Andrew 2	17-149	17-403
PHI	Phillips, Wendy	17-153	17-404
POL	Pollard, Linda	17-158	17-411
POM	Pompilio, Joie	17-159	17-412
POP	Pope, Mary	17-160	17-413
RAM	Ramirez, John	17-161	17-414
REN	Reniche, Michele	17-162	17-415
RIZ	Rizzi, Joseph	17-163	17-416
RIZ2	Rizzi2, Joseph	17-164	17-417
SAB	Sabosky, Terri	17-165	17-418
SAC	Sackett, Amanda	17-167	17-419
SALA	Salas, Steve	17-169	17-420
SALO	Salonen, Laura	17-170	17-421
SBE	Sberna, Angelina	17-171	17-422
SCHR	Schroeder, Matthew	17-172	17-423
SCHU	Schultz, Janice	17-173	17-424
SCHUJ	Schulz, Juli	17-174	17-425
SCHUV	Schultz, Vic	17-175	17-426
SEN	Senser, Gary	17-176	17-427
SHA	Shamos, Elias	17-177	17-428
SIE	Sievers, Bob	17-178	17-429
SIE2	Sievers, Bob 2	17-180	17-430
SIEN	Sievers, Nate	17-181	17-431
SLO	Slominski, Marilyn	17-182	17-432
SMI	Smith, K.	17-183	17-433

<b>Letter Code</b>	<b>Commenting Party</b>	<b>Letter Page Number</b>	<b>Response Page Number</b>
SOD	Soderberg, Jane	17-184	17-434
SPI	Spiewak, Aaron	17-185	17-435
STAC	Stanich, Christy	17-186	17-436
STAJ	Stanich, Jim	17-187	17-437
STAN	Stansbury, Travis	17-189	17-438
STAU	Stauber, Nic	17-190	17-439
STAV	Stavropolous, William	17-191	17-440
TEL	Tellis, Ed	17-192	17-441
TIS	Tisdale, Ralph	17-194	17-442
TIS2	Tisdale, Ralph 2	17-195	17-443
UGA	Ugarte, Gregory	17-197	17-445
UNG	Ungoco, Joseph	17-198	17-446
VAN	Van Neas, Debra	17-199	17-447
VIC	Vickers, Norman	17-200	17-448
WAL	Wald, Mark	17-201	17-449
WEI	Weinsheim, Kyle	17-202	17-450
WEN	Wenglikowski, Laura	17-204	17-451
WIC	Wickemeyer, Kelly	17-205	17-452
WILC	Wilcox, John	17-206	17-453
WIL	Williams, Tom	17-207	17-455
WIL2	Williams, Tom 2	17-208	17-456
WIL3	Williams, Tom 3	17-209	17-457
WIL4	Williams, Tom 4	17-210	17-458
WIL5	Williams, Tom 5	17-211	17-459
WIN	Wingate, Carol	17-237	17-482
WOO	Woodcock, Darryl	17-239	17-484
YOCO	Young, Colleen	17-240	17-485
YOJE	Young, Jefferson	17-242	17-491
YOJU	Young, Julie	17-243	17-492
ZAN	Zani, Chad	17-244	17-493
ZAR	Zaremski, Dr. Lori	17-246	17-494
ZAR2	Zaremski, Dr. Lori 2	17-247	17-495
ZUA	Zuanich-Ferrell, Jacqueline	17-249	17-496
ZUA2	Zuanich-Ferrell, Jacqueline 2	17-250	17-497

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# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

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This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Diegi Abdelnur

Mailing Address 122 E Maple Ave El Segundo Ca 90245  
Street City State Zip

Telephone # (daytime) 310 - 365 - 5805

E-mail Address d.abdelnur@hotmail.com

Organization/Affiliation citizen

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

In terms of potential ~~the~~ effects on marine life and micro-organisms ~~as a result of the intake of seawater and the discharge of brine water~~ the EIR states "Less than Significant with mitigation"

① If the plant is approved and running, who (or what agency) monitors the surrounding marine life, and if it is determined that the impact is more significant than anticipated, how will that affect the operation of the plant? I.E. would west basin be obligated to "fix the issue" to lessen impact on the marine life?

ABD-1

ABD-2

To mail: fold, staple or tape together, and include a stamp.

**Comment Letter ADAMS**

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/29/2018	Dr. Gladi Adams	4020 Ocean Drive	Manhattan Beach	CA	90266	As a homeowner here for the last 43 years, this project will cause enormous harm to our Ocean and the fish. We do not need any artificial water producers as we are self sufficient with our conservation efforts. I am a member of Ocean Conservancy and I completely reject this project. Dr. Gladi Adams

ADA-1



**From:** Jane Affonso  
**To:** [West Basin Desal EIR](#)  
**Subject:** Letter opposed to Desal Plant  
**Date:** Tuesday, May 01, 2018 11:37:42 PM

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Dear West Basin Water District Board:

I am opposed to the proposed desalination plant in El Segundo for 3 reasons:

- environmental concerns which were not fully addressed in the EIR.
- excess use of energy at a time when we are facing climate change
- enormous cost.

AFF-1

There are less toxic, more efficient and cheaper solutions to our need for water. Conservation, waste water purification and storm water recapture are all preferred. Why do we think it is better to convert ocean water to drinking water instead of brackish or waste water which to not have the problematic salinity.

Follow the money. I urge you to reject this plant.

AFF-2

Thank you.

Sincerely,

Jane Affonso  
1919 Belmont Lane  
Redondo Beach, CA 90278

**From:** West Basin  
**Sent:** Tuesday, April 24, 2018 1:46 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Grant & Lynn Ahearn

**Mailing Address:** 420 36th Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 213-703-9628

**Email Address:** grantahearn56@gmail.com

**Organization:** Manhattan Beach property owner & resident

**Comments:**

We object to the proposed West Basin Municipal Water District Ocean Water Desalination Project. Homeowners in north Manhattan Beach already have too much industrial activity adjacent to their properties (refinery, power plant, water plant, and LAX). Adding additional industrial activity - especially the planned south project - is unreasonable.

AHE-1

**From:** West Basin  
**Sent:** Friday, April 6, 2018 6:36 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Jose and Liz Alvarez

**Mailing Address:** 1503 Goodman ave  
**City:** Redondo Beach  
**State:** CA  
**Zip:** 902778

**Telephone # (daytime):** 3310-990-3977

**Email Address:** Eking7@verizon.net

**Organization:**

**Comments:**

I am am against This plan! My property is 4113 Highland Ave, Manhattan Beach, ca 90266

ALV-1



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

**This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.**

Name (print clearly) \_\_\_\_\_

Mailing Address \_\_\_\_\_  
Street City State Zip

Telephone # (daytime) \_\_\_\_\_

E-mail Address \_\_\_\_\_

Organization/Affiliation \_\_\_\_\_

**Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.**

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

RECYCLE, NOT DESAL | ANO-1

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**To mail: fold, staple or tape together, and include a stamp.**

**From:** West Basin  
**Sent:** Wednesday, April 11, 2018 4:13 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Karen arensdorf

**Mailing Address:** 562 30th st  
**City:** Manhattan beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3105465095

**Email Address:** Mbbarn@verizon.net

**Organization:**

**Comments:**

I am extremely unhappy about this plant going in right next to manhattan beach!  
Please don't do this!!!!

ARE-1

**From:** Aida Ashouri  
**To:** [West Basin Desal EIR](#)  
**Subject:** Desalination Plant Comment  
**Date:** Monday, June 25, 2018 10:35:48 PM  
**Attachments:** [Desalination Plant Comment.pdf](#)

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To whom it may concern,

Please find attached my comment. I did not find any time-specific deadline for comment submission on the website or through the news, only that June 25 is the deadline so I should be able to submit this comment as it is still June 25.

ASH-1

Sincerely,

Aida Ashouri

Aida Ashouri  
221 38th Place  
Manhattan Beach, CA 90266

June 25, 2018

West Basin Municipal Water District1  
7140 S. Avalon Blvd., Suite 210  
Carson, CA 90746

RE: De-salination Plant Comment Period through June 25

As a resident of Manhattan Beach, I am staunchly against the de-salination plant for the following reasons.

- The plant would be in a non-attainment zone with highly sensitive ozone levels among four other sources of high pollution
- Because the plant is among four other sources of high pollution, any additional plants would have a dramatic impact on the value of the land and quality of life for the vicinity
- The plant is a waste of resources; other countries extensively exhaust alternatives before using ocean water – there is no strong evidence, besides the EIR section on “alternatives” that glosses over their necessity, that alternatives have been assessed before the ocean is utilized
- Construction itself would have a great impact on the area regarding traffic, pollution, obstruction of visibility of the area, and affect property values and quality of life greatly considering the plant’s proximity to a high-value residential area
- There is an immense impact on the environment both social quality and environmentally
  - The plant would be in the vicinity of a highly trafficked beach and would impact enjoyment of the area
  - The brine in the ocean will affect beach going and the ocean life
  - The use of ocean water makes Los Angeles county a poor example of environmentalism as it demonstrates that even though Los Angeles has not effectively used alternatives, it is willing to harm the environment and consume more resources

ASH-2

ASH-3

ASH-4

ASH-5

ASH-6

The Clean Air Act requires for areas that already have polluted air (meaning the area is not meeting the National Ambient Air Quality Standards for nitrogen oxides and sulfur dioxides, etc.), then the company must comply with Prevention of Significant Deterioration requirements. The district can't just permit an increase without studying how the increase in pollutants and production will affect the already polluted air in the area.

ASH-7

As a resident in the area, I am already impacted by emissions by the DWP, Chevron refinery, power plant, and the airport among other pollution emitting sources. These sources already affect my health by greatly emitting pollution, smoke, odors, and causing eyesores in the

community. Most significantly, the immense construction of this plant is going to contribute a great deal of pollution, notably dust and odors in a very sensitive and over-inundated area of pollution. The South Bay has been noted to be one of the sources of the greatest amount of pollution in the country.

Southern California is already noted to have very high ozone levels, among the highest in the country. Steve Scauzillo, San Gabriel Valley Tribune, April 18, 2018, *Southern California Still Has Some of the Worst Air Pollution in the Country*, Report Finds, available at <https://www.dailynews.com/2018/04/18/southern-california-has-some-of-the-worst-air-pollution-in-the-country-report-finds/>. “For the second year in a row, Los Angeles, Riverside, Ventura, San Bernardino and Orange counties recorded the nation’s highest number of unhealthy days for ozone, the caustic, lung-damaging gas that cause shortness of breath and in the long term is associated with asthma, COPD and lung cancer.” *Id.* Los Angeles is listed as the most pollution city with ozone pollution. Zoë Schlanger, Quartz Media, April 19, 2017, *California Is Home to Eight of the 10 Cities in America Where Air Pollution Is Worst*, available at <https://qz.com/963089/california-is-home-to-eight-of-the-10-cities-in-america-where-air-pollution-is-worst/>.

ASH-7

There are a multitude of reasons that this plant should be blocked. As the bulk of water is used by industry, agriculture, and landscaping, reducing water usage for these sources has also not been exhausted. Industry especially should be either recycling fracking water (instead of agriculture) in making products, or use non-potable water strictly. Landscaping should be limited or a tax be put in place to restrict water usage. Agriculture should be encouraged to use practices the reduce water usage and capture rainfall and condensation. A de-salination plant should be the last resort for Los Angeles, something that a desert island should resort to, not to a metropolitan city with a myriad of alternatives. De-salination results in a dramatic impact on the environment, the plant itself is going to affect an already sensitive area, and it will affect the community that it will be in close proximity with, affecting land value and quality of life, especially during construction.

ASH-8

Due to the preceding reasons we adamantly oppose construction.

Sincerely,  
  
Aida Ashouri  
Violet Akhondzadeh



## Comment Letter BACHELDER

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/29/2018	Laura Bachelder	128 40th street	manhattna beach	CA	90266	Besides the fact that desalinization increases the salinity level of the Ocean, increasing therefore the evaporation process, which at the end will expedite the desertification of the hearth; besides the fact that desalinization will impact and disrupt even further the Ocean life, building a plant so close to LA water depuration system is a recipe for disaster. Consider if the depuration system of LA fails, how will the desalinization plant react? Also, the area is densely populated and highly touristic. The plant will have a highly negative impact on all the residents and visitors to this area. This is the worst plan you can come up with.

BAC-1



# West Basin Municipal Water District Ocean Water Desalination Project

Comment Letter BARISA

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) BART BARISA

Mailing Address 625 ESPLANADE #39 Redondo Beach CA 90277  
Street City State Zip

Telephone # (daytime) (310) 316-2121

E-mail Address \_\_\_\_\_

Organization/Affiliation RETIRED

Please provide comments in the section below and leave in comment box or place in mail by Monday, June 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

With the issues of Earthquakes, Terrorism and other catastrophies, I feel that you should build 2 plants, possibly, one in EL Segundo and one in Redondo Beach, so that if one plant is damaged or destroyed, the other plant could still furnish ~~the~~ water to the other beach cities as well as their particular area. It is like having a twin engine airplane, if one engine fails, the plane ~~could~~ can still fly.

This is desert country, we can't rely on rain.

BAR-1

BAR-2

To mail: fold, staple or tape together, and include a stamp.

**From:** West Basin  
**Sent:** Friday, April 6, 2018 6:41 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** James Baumann

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** jameskbaumann12@gmail.com

**Organization:**

**Comments:**

Please put in North Location. Not south..

BAUJ-1

**From:** West Basin  
**Sent:** Tuesday, April 10, 2018 9:04 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Liane Baumann

**Mailing Address:**  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Kalenaliane@gmail.com

**Organization:**

**Comments:**  
I'll agree to a desalination plant if it's swapped out with one of the other eyesores in that general area. You people need to get a clue. No one wants to look at this crap. Find a beach with no accessibility and no residential to destroy instead of our home.

BAUL-1

**From:** West Basin  
**Sent:** Friday, June 22, 2018 1:48 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Bill Becker

**Mailing Address:** 2901 Oak Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3106436599

**Email Address:** Beckerlegal@outlook.com

**Organization:** Law Office of Willian Becker

**Comments:**

The reports confirms what we all knew. The project is a wonderful addition to our community. It is an environmentally sound endeavor that recognizes desalinization is the best way to add water until condensation technology advances. Conservation is not an option as our water currently comes from the water project and is unsustainable. We do not need to be patched when we live next to the ocean and power rates makes desalinization green and less expensive than. Imported water. I hope this plant is phase one of a more ch more ambitious project. I like my industrial neighbors; Chevron, west Basin, LAX, Hyperion, Scattergood and NRG. I knew they were here when I arrived and they provide valuable services to our community and beyond. Water needs will continue to rise with population growth. Our goal in the South Bay should be to be self sufficient with our water and power generation. That is the greenest if goals and the only one true environmentalists like me support.

BECEB-1

**From:** West Basin  
**Sent:** Monday, April 23, 2018 7:57 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments  
**Attachments:** ElSegundoSearise-ClimateCentral.jpg

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Comments - Form from West Basin Desal Site

**Name:** Richard Becker

**Mailing Address:**

**City:** Redondo Beach

**State:**

**Zip:** 90277

**Telephone # (daytime):**

**Email Address:** engrbecker@gmail.com

**Organization:**

**Comments:**

1) Make sure the plant is properly designed (100 year event minimum) for earthquakes, tsunamis, liquefaction, and sea level rise. 2) I support the construction of desalination plants; make sure you follow a successful design strategy like those plants in Israel, rather than the unsuccessful attempts in Australia, etc. Why draw water through existing obsolete distribution systems for hundreds of miles, when the water is at your doorstep? [www.scientificamerican.com/article/israel-proves-the-desalination-era-is-here/](http://www.scientificamerican.com/article/israel-proves-the-desalination-era-is-here/)

BECR-1

Surging Seas: STAKES RISING: YEAR 2100

21 Rosecrans Ave, El Cerrito, CA 94530  
 Commit Letter BECKER

Download map image

21 Rosecrans Ave, El Cerrito, CA 94530  
 Commit Letter BECKER

21 Rosecrans Ave, El Cerrito, CA 94530  
 Commit Letter BECKER



x  
 Without big cuts in climate pollution, an unstable Antarctica could double previous sea level projections. This map shows what could be affected.  
 See report

**Choose a scenario:**

- Unchecked pollution
- Sharp carbon cuts
- Current coast

Map factors in new Antarctic research  
 Switch projections

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 3:00 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Paul Beswick

**Mailing Address:** 1729 Pacific Avenue  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310-545-5229

**Email Address:** pgb7723@earthlink.net

**Organization:** Resident/Home Owner/Customer

**Comments:**

Public Comment In Opposition To Proposed West Basin Desalination Plant - submitted to West Basin Municipal Water District on June 20, 2018 As a 35-year Manhattan Beach resident, chemical engineer, recent retiree, after more than 20 years, from the Metropolitan Water District of Southern California and prior Manhattan Beach Environmental Task Force member, I have considerable interest in and some knowledge on the subject of our drinking water supplies. I have attended a West Basin MWD Public Meeting on the draft Environmental Impact Report (EIR) for their proposed desalination plant and read Beach Reporter articles and letters on this subject, pro and con. While there is truth in a lot of the views that were expressed by the public and West Basin personnel, I am concerned that an accurate picture of our current drinking water supply situation and the options available to us has really not been accurately portrayed. Yes, we do need diverse sources for our drinking water and we do need to reduce our dependence on imported water. We need to increase our water storage, to more aggressively pursue rainwater capture and, very importantly, we need to increase conservation. However, I do not believe that desalination should be the focus by West Basin as an additional drinking water source, but rather increased waste water recycling should be promoted instead. West Basin already has a waste water recycling facility beside the golf course in El Segundo, which is capable of producing drinking water that meets or exceeds State and EPA water quality standards. West Basin should focus its money and resources on expanding and technologically upgrading this facility and educating the public about waste water recycling, instead of wasteful spending on a desalination plant. Numerous scientific studies have shown that waste water recycling is preferable to





**Comment Letter BESWICK**

desalination “ more economical and with a much smaller environmental footprint (far less energy use and without the toxic brine discharge to the ocean). Furthermore, state drinking water regulators are moving forward on an aggressive timetable for a direct potable reuse (DPR) where recycled waste water can be blended directly with treated drinking water from surface and ground water sources. In summary, West Basin has other less costly, less energy intensive and more environmentally friendly options available to it to achieve its objectives of water source diversification. I believe that the West Basin draft EIR on the proposed desalination project, in its review of alternatives to the proposed project (see EIR Section 7), shows a distinct bias towards the desalination project and does not accurately present the true value of these alternatives. If West Basin were to move forward with the proposed desalination project, the impact on residents in its service area would be a needless increase in water rates to fund the project, as well as an unnecessary, negative environmental footprint in El Segundo and an unnecessary blemish along coast of Santa Monica Bay in an area that might be reclaimed from the soon-to-be decommissioned El Segundo Generating Station. Because of the reasons I have outlined above, I urge West Basin's Board of Directors to oppose the Draft Environmental Impact Report on Ocean Desalination Plant Proposed by the West Basin Municipal Water District. Thank you for allowing me to express my opinion on this very important matter. Please do not hesitate to contact me if you have any questions or would like to discuss this matter with me. Sincerely, -- Paul Paul G. Beswick

BES-3

BES-4

BES-5

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 12:21 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Peter Boone

**Mailing Address:** 4308 The Strand  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** ppboone@roadrunner.com

**Organization:**

**Comments:**

I strongly oppose putting the plant on 45th Street. I believe it will add to the traffic on 45th (which is sometimes gridlocked by cars waiting to get into the beach parking lot) and will likely reduce the number of parking places on 45th.

BOO-1

**From:** West Basin  
**Sent:** Saturday, April 7, 2018 4:36 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Frank Boroch

**Mailing Address:** 1728 N Poinsettia  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Frankboroch@yahoo.com

**Organization:**

**Comments:**

The proposed locations for the desalination facility are too close to a residential area - the El Porto section in north Manhattan Beach. The expected impact on residents, such as noise and air pollution is of great concern. Construction of a project of this size would create a major traffic problem affecting one of the major north-south gateways into and out of Manhattan Beach - Vista del Mar/Highland Ave. If the project has to be located at a beach site, why not place it to the north across from the Hyperion Facility or the Scattergood generating station where there are no residences.

BOR-1

**Comment Letter BRADY**

**From:** Theresa Brady  
**To:** [West Basin Desal EIR](#)  
**Cc:** [theresa\\_bradly](#)  
**Subject:** comments on the west basin ocean water desalination project  
**Date:** Monday, June 25, 2018 2:07:58 PM  
**Attachments:** [041714-FactSheet.pdf](#)  
[Flush11x17-663x1024.png](#)  
[WasteResource.jpg](#)

June 25, 2018  
21844 Corvo Way  
Topanga, California 90290

West Basin Municipal Water District  
Attn: Zita Yu, PhD P.E., Project Manager  
17140 South Avalon Boulevard suite 210  
Carson, California 90746  
[desalEIR@westbasin.org](mailto:desalEIR@westbasin.org)

Dear Zita Yu:

The desalinization plant proposed by West Basin should be postponed for at least 2 years. The climate change impact of the desal plant cannot be mitigated. We are now in the midst of the 6<sup>th</sup> great extinction. The north pole is nearly ice free for the first time in human history. Use of fossil fuels should be stopped in every possible way as soon as possible. There are significant effects on climate change during the building and the production stages. Large quantities are noted in the EIR of both gasoline for vehicles and equipment and for natural gas. The increased use of natural gas should be completely avoided since natural gas is methane and is even more potent than CO2 as a driver of climate change. Building this desal plant would cause unmitigatable harm to future generations in the form of climate change.

BRAD-1

The discharged water from Hyperion has been proposed as an alternative: to have it treated to point of being potable. This should be more thoroughly studied now.

BRAD-2

Conservation measures should be more thoroughly explored and implemented. Your recent

effort to encourage gray water and to distribute rainbarrels are a good start toward conservation.

One more effort that could reduce water use, and make the treatment of Hyperion water easier and more acceptable, is to focus on composting toilets.

BRAD-2

Composting toilets would be another major source of conservation. In two years, the Occidental Arts and Ecology Center will complete their study of the effectiveness of composting toilets. They are doing this study in conjunction with government agencies and a University. In this way, they will also clarify what are the governmental hurdles and make the study repeatable for scientific proof. Composting toilets are a way to reduce fresh water use by 20 gallons per person per day, on average. That is the average amount of water used in the toilet for each person per day according to OAEC. The use of composting toilets takes human excrement out of the water cycle, thereby makes treatment of water for reuse less complex, and makes reused water have lower pathogens.

BRAD-3

The OAEC study just began this year in 2018. In two years there will be results from this scientific study on how this technology can best be used.

Los Angeles County law already allows unincorporated Los Angeles county residents to install a composting toilet as long as they also have a water toilet installed in their home. Many of your customers live in unincorporated Los Angeles County, such as the Del Aire community, so this is a policy that you could implement now. This desal plant should be put on the shelf and conservation methods such as composting toilets should be evaluated and made available to county residents, as a pilot program, as soon as the literature is reviewed and a policy can be adopted.

BRAD-4

Desal plants are costly up front and may be unnecessary if conservation measures are put in place. For example, the conservation measures adopted in San Diego also should be considered since they were very effective at saving water. San Diego did not need the water from the desal plant when they implemented conservation measures. In fact, they found they had 500 million gallons too much. The desal plant, in Carlsbad, the provider for San Diego, turned out to be unnecessary: San Diego had a 500,000,000 gallon surplus due to conservation. They are however,

BRAD-5

**Comment Letter BRADY**

locked into a contract and have to buy the more costly desal water from the plant in Carlsbad for many years to come. This is a waste of energy, biological resources and ratepayer funds.

↑  
BRAD-5

These are all reasons why the El Segundo desal plant should be reconsidered. When 2 years passes, there may be many conservation measures that would use less energy and have less impact on climate change and marine life than this plant. This plant would cause global warming, waste the dwindling supply of fossil fuel, harm microscopic sea life, (such as krill and young fish,) and has already upset your neighbors. In two years it may more clearly be seen, it is unneeded. If you delay the start of this and then reconsider all the factors to see if it is in fact needed, after studying more conservation measures (like composting toilets )you may save rate payer money and make the neighbors happier, all while reducing your impact on climate change as well.

BRAD-6

Thank you. I am attaching several resources about composting toilets for the record.

BRAD-7

Theresa Brady

## **'NON-PROPRIETARY' COMPOSTING TOILET FAQ:**

1. **What is a composting toilet system?** – A composting toilet does not require the use of water or electricity and is a way to contain and control the composting of excrement, toilet paper, and carbon additive in an unsaturated, aerobic environment.
2. **How does the composting process work?** Thermophilic (bacteria living above 113°F) and/or mesophilic (bacteria living at 68-113°F) aerobic bacteria and fungi break down wastes through the composting process. The composting process requires:
  - a. Heat – composting is most efficient at temperatures of 65°F to 135°F (meso-thermophilic). If sufficient mass and food is available the temperature will be maintained by the respective microorganism populations until food resources are consumed.
  - b. Aeration – to maintain aerobic microorganism populations which facilitate the processing of the compost.
  - c. Moisture – range of 40-70% (like a well-wrung sponge) to maintain microorganisms.
  - d. Carbon:Nitrogen Ratio – about 30:1 is ideal.
  - e. Microorganisms – To facilitate a quicker start in new composting bins an inoculation with a microbe starter or a shovel of finished compost may be desired.
3. **What is the end product of the composting process and what is its appropriate use?**
  - a. Composting toilets remove most of the biological oxygen demand (BOD) and reduce waste volume to 10-30% of original volume.
  - b. The result is “humanure” (not the same as treated sewage sludge which may contain industrial wastes). Fecal coliforms and other pathogens are deactivated in the composting process (minimum required composting time is dependent on temperature and intended use).
  - c. Humanure is a stable, soil-like material called “humus”. Humus is a common soil conditioner critical to agricultural systems.
  - d. Recommended to use composted humanure (similar to residential greywater re-use) on-site only, distributed in mulch basins around fruit trees, and not to come in contact with edible portions of food producing plants.
4. **Why would someone in Arizona want to use a composting toilet?**
  - a. Conserves potable water by not flushing, ~ 10gpcd, 3650gal/yr/person;
  - b. Conserves energy: 45-550 kWh/yr/person (enough energy to light a 100 W bulb for ~450 - 5550 hours) for sourcing water and treating waste water (*depending on pumping distance, depth, quality of source water, and other variations*)(source: Lancaster 2012)
  - c. Conserves additional water by conserving energy: 23gal – 282gal/yr/person (*based on coal power*) (source: Lancaster 2012)
  - d. Creates a renewable on-site soil building resource, humanure which helps return nutrients to the soil:
    - i. An average person can fertilize 15-30ft<sup>2</sup> of crops based on organic content
    - ii. Adds a locally-sourced, stable, organic material to soil
  - e. Rural: an alternative to septic systems. Septic systems may be too expensive or soil constraints too limiting (e.g. low percolation, high water tables, shallow soil, or rough terrain)
  - f. Urban: desire to expand bathroom w/ sustainable technologies, reduce need for new/upgraded waste treatment facility
  - g. More cost-effective to treat waste on-site than it is to build and maintain a central sewer system
  - h. Nutrients are kept in tight biological cycles without causing problems to receiving waters

- i. Moving from disposal based thinking to resource utilization
5. **What regulations exist for composting toilets in Arizona?** Composting toilet regulations in Arizona address performance standards, design requirements, operation, and maintenance requirements as well as the disposition of the non-toilet “wastewater” flow (sinks, laundry, etc).
  6. **What is a site-built composting toilet?** A “site-built” composting toilet refers to a system that can be constructed on-site as compared to a pre-fabricated, commercially available composting toilet. The Composting Toilet Research Action Pilot spearheaded by Watershed Management Group (WMG) is evaluating two basic “site-built” designs (designs are publically available for free). If the systems prove to be robust in durability, user likeability, and effectively minimize pathogen risks, the designs will be proposed to ADEQ to be listed as selection options under ADEQ’s 4.03 General Permit under Aquifer Protection.
    - a. Standard permit cost = \$500-\$1000+
    - b. # of Composting Toilet permits issued between 2005-2007: 35
    - c. Non-proprietary Permit cost = \$1000 to review design + \$1000 for the permit (if design approved)
    - d. # of residents who have applied for a non-proprietary composting toilet permit: 0
    - e. # of residents with non-proprietary composting toilets in urban Tucson: Estimated 50-100+
  7. **Why would someone choose a “non-proprietary” (or “site-built”) composting toilet over a commercially purchased and certified system?**
    - a. system is cheaper in cost (\$200-\$400 vs \$1,200-\$6,000)
    - b. desire for simplicity
    - c. custom fit or design based on site constraints
    - d. often better performance
    - e. easily repaired if needed, fewer moving parts, gadgets, and gizmos to break or require costly repairs
  8. **What about controlling odors, flies, and common pathogens?**
    - a. Odors – odor is considered information in the management of the system. If odors are present then management is required typically in the form of 1) aerating and/or 2) adding carbonaceous cover material to maintain the C:N ratio.
    - b. Flies – flies are a potential vector of pathogens to humans. Flies and other insects can be easily controlled by ensuring the system is well sealed. In outdoor environments a fly trap is effective at attracting flies if they gain access and prevents them from exiting the system.
    - c. Common pathogens – fecal coliforms (i.e. E.coli), *ascaris lumbricoides* (roundworm), Cryptosporidium and enteric viruses (e.g. norovirus); *According to Dr. Chuck Gerba (UA Research Professor), ascaris is not a common pathogen in Arizona.*
  9. **What about the diverted urine from a composting toilet?** – urine accounts for ~90% of N and 50% of P in household wastewater but only 1% of the flow volume. Urine is typically sterile. If stored for a short period of time potential pathogens in urine are deactivated.
    - a. Corresponding N-P-K values of urine are 11-1.5-2
    - b. The ammonia (NH<sub>4</sub>) in urine must undergo nitrification to be plant useable. This occurs in aerobic environments which make it ideal to apply urine to well-mulched soil and promote plant uptake of nitrate.
    - c. Conventional septic tanks remove only ~1-3% of nitrogen and then a total of 21-25% if an additional soil absorption system is included. By diverting urine and applying to well-mulched soil a majority of the nitrogen is made plant available.



- d. Based on 1 adult consuming 550lbs of cereals per year, ~70% of the consumed cereal crop could be fertilized based on urine alone (and an additional 13% accounting for humanure). (Drangert, 1998)

**10. What are the associated environmental and health risks to a community with individuals using and maintaining (site-built) composting toilets and utilizing diverted urine?**

- a. As long as the composting material remains on site and contained until treatment is complete there are no environmental health risks. If the material has been composted completely all of the pathogens (disease causing organism) should have been destroyed. It is important that the material during composting be contained as to ensure that rainfall events cannot carry the material off-site.
- b. Urine utilization: Ingestion of crops contaminated with urine resulted in risks of  $<10^{-5}$  after a 3-week ( $<10^{-7}$  after 4 weeks) withholding period between fertilizing and harvesting. (Höglund et al, 2002)

**11. What does a community gain with the use of 'site-built' composting toilets and a standard permitting process?**

- a. Potentially reduces number of systems unknown to regulators and ensures specified standards are met
- b. Reduces need to import/mine soil nutrient amendments saving 216-621 lbs CO<sub>2</sub> per year
- c. Reduces strain on limited potable water supplies and aging waste water infrastructure

**12. Where can I learn more?**

- a. David Del Porto and Carol Steinfeld, [The Composting Toilet System Book](#)
- b. Drangert, J. 1998. Fighting the urine blindness to provide more sanitation options. *Water SA*. 24(2): 157-164.
- c. Ecosanres.org --> Jönsson et al., 2004. Guidelines on the Use of Urine and Faeces in Crop Production. EcoSanRes. Stockholm Environment Institute.
- d. Höglund, C. et al. 2002. Microbia risk assessment of source-separated urine used in agriculture. *Waste Management and Research*. 20: 150-161.
- e. Joseph Jenkins, [The Humanure Handbook](http://humanurehandbook.com), <http://humanurehandbook.com>
- f. Brad Lancaster, [www.harvestingrainwater.com/water-energy-carbon-nexus](http://www.harvestingrainwater.com/water-energy-carbon-nexus)
- g. David Omick, [www.omick.net](http://www.omick.net)
- h. Recode Oregon, [www.recodeoregon.org/composting-toilets-in-oregon](http://www.recodeoregon.org/composting-toilets-in-oregon)
- i. Rich Earth Institute, [www.richearthinstitute.org](http://www.richearthinstitute.org)
- j. U.S. Environmental Protection Agency. 1999. Water Efficiency Technology Fact Sheet, Composting Toilets. EPA 832-F-99-066.
- k. Watershed Management Group, [www.watershedmg.org/soil-stewards](http://www.watershedmg.org/soil-stewards)



CALIFORNIA  
CAN'T AFFORD TO

# FLUSH



## WATER

We're in a drought. Yet the average Californian flushes 16 to 24 gallons of clean drinking water down the toilet every day! And that doesn't include the countless gallons lost through leaky pipes & outdated infrastructure.



## ENERGY

20% of California's energy is used for water related uses, including transport and treatment. So when we waste water, we waste energy. When we waste energy, we contribute to greenhouse gas emissions and climate change.



## SOIL

Deforestation, industrial agriculture, and over-development have broken the natural carbon cycle by polluting, paving over, and eroding California's precious topsoils without putting anything back in return. Aging centralized wastewater treatment facilities are inefficient & ineffective at removing contaminants and degrade the soil nutrient cycle rather than restoring it.



OCCIDENTAL ARTS  
& ECOLOGY CENTER

# DOWN THE TOILET

## COMPOSTING TOILETS CAN:

- Safely process pathogens & ensure public health
- Save billions of gallons of water annually & help cities comply with mandatory conservation measures for drought
- Improve water quality by decreasing pollution of drinking water
- Replace failing septic systems & outdated wastewater infrastructure
- Help meet green house gas reduction goals by reducing energy used for water transport and treatment
- Create affordable, natural alternatives to chemical "porta-potties"
- Build topsoil through nutrient capture
- Sequester carbon & help mitigate climate change



'WASTE'

= RESOURCE

WWW.OAEC.ORG/  
COMPOST-TOILET-RESEARCH-PROJECT

OCCIDENTAL ARTS  
& ECOLOGY CENTER



**From:** West Basin  
**Sent:** Friday, April 6, 2018 9:55 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** SAMUEL J. BRAITMAN

**Mailing Address:** 4102 THE STRAND  
**City:** MANHATTAN BEACH  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** (310) 227-7788

**Email Address:** sjbraitman@hotmail.com

**Organization:**

**Comments:**

The proposed locations for the desalination facility are too close to a residential area - the El Porto section in north Manhattan Beach. The expected impact on residents, such as noise and air pollution is of great concern. Construction of a project of this size would create a major traffic problem affecting one of the major north-south gateways into and out of Manhattan Beach - Vista del Mar/Highland Ave. If the project has to be located at a beach site, why not place it to the north across from the Hyperion Facility or the Scattergood generating station where there are no residences.

BRAI-1

**Comment Letter BRAUNECKER**

**From:** West Basin  
**Sent:** Thursday, June 21, 2018 1:07 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Bonnie Braunecker

**Mailing Address:** 1440 E Sycamore Ave  
**City:** El Segundo  
**State:** CA  
**Zip:** 90245

**Telephone # (daytime):** 3106408770

**Email Address:** bbraunecker@gmail.com

**Organization:**

**Comments:**

I am STRONGLY opposed to the Desalination plan for the El Segundo/Manhattan Beach area! It's a very short sighted proposal with a huge financial and ecological impact. Come up with a more responsible plan to address this issue.

┌  
BRAU-1  
└

**Comment Letter BRAUNECKER2**

**From:** Bonnie Braunecker  
**To:** [West Basin Desal EIR](#)  
**Subject:** Manhattan Beach desalination project  
**Date:** Thursday, June 21, 2018 1:15:23 PM

---

I STRONGLY oppose the desalination plan for the Manhattan Beach/El Segundo beaches. This short sighted proposal is both a financial and ecological disaster. Come up with a better plan that has long term success, such as an educational program to change the negative association of the Hyperion water that is already clean. That would be money well spent!

BRAU2-1  
BRAU2-2

Sincerely,  
Bonnie Braunecker

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 10:04 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** niklas bringleson

**Mailing Address:** 120 shell street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3105146003

**Email Address:** niko2son@gmail.com

**Organization:** Homeowner in El Porto, Manhattan Beach

**Comments:**

Hi, I have been a homeowner in this neighborhood for over 5 years. Please I urge you to develop the North Site and not the South Site. Developing the South Site will have a detrimental effect on our property values and will cause external obsolescence. The neighborhood will fight you on it all the way. Developing the North Site would be highly preferred by all that choose to live here. Thank you for considering our opinion. Regards, Niklas Bringleson (310)514-6003

BRI-1

**From:** West Basin  
**Sent:** Tuesday, April 10, 2018 9:20 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Michelle Bueltel

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** mmbueltel@gmail.com

**Organization:**

**Comments:**

North side is preferable

| BUE-1

**From:** West Basin  
**Sent:** Friday, April 6, 2018 6:00 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Peter Chang

**Mailing Address:** 45th st, El porto  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** ptchang1@yahoo.com

**Organization:**

**Comments:**

Currently as is we have enough to deal with as far as noise and construction. I work from home and haveing something that close to me would be more than an annoyance. I think the plant should be further north past the jetty. I would hate to see the area and beaches affected more than they already are from the current situation.

CHA-1





# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

**This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.**

Name (print clearly) D. CHRISTOPHER

Mailing Address P.O. Box 366 Lanndale CA 90760  
Street City State Zip

Telephone # (daytime) 310-725-0845

E-mail Address \_\_\_\_\_

Organization/Affiliation S.C.A.G. Inc.

**Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.**

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

Would AIR TO WATER GENERATORS  
HELP CREATE MORE WATER? ~~HELP~~

|  
CHR-1  
|

To mail: fold, staple or tape together, and include a stamp.

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 1:37 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Ben Clayton

**Mailing Address:** 18355 South Figueroa St.

**City:** Gardena

**State:** CA

**Zip:** 9

**Telephone # (daytime):**

**Email Address:** ben.clayton@ua250.org

**Organization:** LU 250

**Comments:**  
WE NEED WATER

CLA-1

**From:** Noemi Luna  
**Sent:** Monday, May 7, 2018 2:00 PM  
**To:** Justin Sumi  
**Subject:** Fw: West Basin Desal Site Comments - Brian Cochran

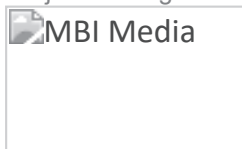
---

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

WB Comment.

--

Noemi Luna  
Project Manager



Covina . Los Angeles . Orange County . San Jose California | (800) 700-1999 [www.mbimedia.com](http://www.mbimedia.com)

Corporate Headquarters Phone : (626) 967-1510 Fax: (626) 967-1718

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Monday, May 7, 2018 1:51 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Brian Cochran

**Mailing Address:**

**City:** Manhattan Beach

**State:**

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** bbcochran@gmail.com

**Organization:** Self

**Comments:**

Please name the elected officials, and their contacts, who will be voting on the positioning of the planned Ocean Water Desalination Project? | COC-1

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 5:07 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Brian Cochran

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Bbcochran@gmail.com

**Organization:**

**Comments:**

Why is the proposed Desal plant considering a "South Location" adjacent to North Manhattan Beach? The North Manhattan Beach population will be adversely impacted by Noise and Visual pollution, according to the EIR. Why is this idyllic location even a consideration?

CO2-1

**Comment Letter  
COHENJ**

Date Received	Name	Organization	Contact Info	Comments
8.				Why was this site chosen for this plant? Why not Palos Verdes or Redondo Beach? Can the comment period be extended by another 30 days?
April 26 <sup>th</sup> 2018	Dr. Zowensk	Self-Concerned Citizen	3221 Gibson Place Redondo Beach, CA 90278 (310)408-6908 drloriz@aol.com	Creating another environmental man-made disaster to poorly address another man made crisis (drought and insufficient water supply) due to poorly planned development in the California desert is reckless and shortsighted
April 26 <sup>th</sup> 2018	Dr. Zowensk	Self-Concerned Citizen	3221 Gibson Place Redondo Beach, CA 90278 (310)408-6908 drloriz@aol.com	How does the possible financial gain to individual water district members affect their voting. Is possible conflict of interest of District board investigated?
April 26 <sup>th</sup> 2018	Dr. Kiran Magiawal	Private Citizen	4015 W 137 <sup>th</sup> St., Apt. 107 Hawthorne, CA 90250 (310)978-1434 kiran_magiawala@yahoo.co.m	Suggestion for evaluating complimentary option for reducing GHG sessions: Working with CalFire, USFS and Nature Conservancy CNGOs, combined to evaluate potential for GHG emission mitigation by planting trees in our state forests that have approximately 130 trillion dead trees at present Thank you! 04/25/2018
April 26 <sup>th</sup> 2018	D. Christopher	S.C.A.G. Inc.	P.O. Box 366 Lawndale, CA 90260 (310)725-0845	Would air to water generators help create more water?
April 26 <sup>th</sup> 2018	Dieg Abdelnur	Citizen	122 E Maple Ave. El Segundo, CA 90245 (310)365-5805 dabdelnur@hotmail.co.m	In terms of potential effects on marine life and micro-organisms as a result of the intake of seawater and the discharge of brine water the EIR states "Less than Significant with Mitigation" If the plant is approved and running, who (or what agency) monitor the surrounding marine life, and if it is determined that the impact is more significant than anticipated, how will that affect the operation of the plant? I.E. would west basin be obligated to "fix the issue" to lessen impact on the marine life?
April 26 <sup>th</sup> 2018	Julia Cohen		119 E. Pine Ave. El Segundo, CA 90245 (213)308-4539 juliaillias@gmail.com	You said 5 elected officials will decide if this moves forward. Where can we find the names of those officials or can you tell us their names right now? Related: is councilman Brann or any other El Segundo elected official currently at this meeting?

**From:** West Basin  
**Sent:** Monday, May 14, 2018 9:12 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Stephen Cohen

**Mailing Address:** 5411 Ocean Unit 104  
**City:** Hawthorne  
**State:** CA  
**Zip:** 90250

**Telephone # (daytime):** 310-283-0353

**Email Address:** Stephen74@ca.rr.com

**Organization:** Surfer El porto local.

**Comments:**

I use the north Manhattan beach every day, 5 years of construction is a significant loss of quality of life for me. I also do not want the effects of the plant and feel we do not need it. Put in a park. There's plenty of room in front of lax for an ugly plant. Use the useless beach north of El Segundo.

COHS-1

**From:** West Basin  
**Sent:** Sunday, April 29, 2018 3:26 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Terry Constant

**Mailing Address:** 2811 N. Valley Drive  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310-985-4000

**Email Address:** terryconstant@live.com

**Organization:**

**Comments:**

I walk these beaches most days and feel that the location by the Hyperion plant (North Location) makes the more sense in terms of less disruption of daily use. Most people use the area south of the "jetty" to surf, run, jog and walk. While the north location gets traffic in the summer there is almost no one there during the other months. But if I were to have any choice the old AES location in Redondo Beach seems like it would be the best as there is no beach at that location to be disrupted. Not sure how that may affect Kings Harbor but in terms of affecting the beaches this one would do the least harm in my opinion. I do think we need a desalination plant - but would prefer the North Location or the AES location as choices compared to the high use south location. Thank you for your consideration. Terry Constant

CON-1



**From:** West Basin  
**Sent:** Saturday, April 7, 2018 9:53 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Renwe

**Mailing Address:** 4216 highland avenue unit e  
**City:** Manhattan beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 7148150456

**Email Address:** renee@reneecroce.com

**Organization:**

**Comments:**

Desalinazation...great idea...i do think that it should be placed as far north as possible [ CROC-1

**From:** West Basin  
**Sent:** Thursday, June 21, 2018 8:19 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Amy Croft

**Mailing Address:** W. 235th  
**City:** Torrance  
**State:** CA  
**Zip:** 90505

**Telephone # (daytime):**

**Email Address:** californiacroft@gmail.com

**Organization:**

**Comments:**

Desalination may be politically popular however more use of recycled /reclaimed water is necessary. We should focus on safe toilet to tap method for tap water. With the ever advancing methods this is the best use of our most important resource. Desalination should be the absolute last resort . Remove the stigma and make it classy toilet to tap is the way to go.

┌  
CROF-1  
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**From:** West Basin  
**Sent:** Wednesday, May 16, 2018 9:54 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Glenn E. Cunningham

**Mailing Address:** 5310 Pali Point Lane  
**City:** La Canada  
**State:** CA  
**Zip:** 91011-2818

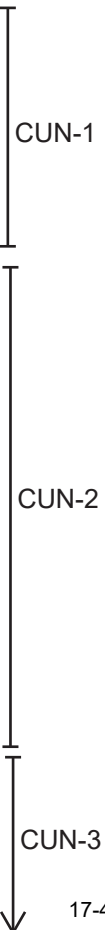
**Telephone # (daytime):** 818-790-7613

**Email Address:** glenn.e.cunningham@usa.net

**Organization:** Property owner in El Porto section of Manhattan Beach

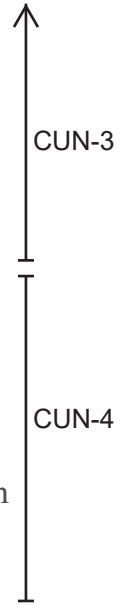
**Comments:**

I fully support the use of desalinated ocean water as necessary contribution to the West Basin Municipal Water District water supply portfolio. I also fully and strongly support the selection of the North Site for the plant primarily because I strongly favor a buffer zone of undeveloped, but landscaped, area between the El Porto residential area of north Manhattan Beach and the industrial facilities to the north, much in the manner that Chevron has a large green zone on the western edge of its facility. Relative to Section 5.1: Aesthetics, Light and Glare The visual impact issues of the south site, for both the Local and Regional implementations, are very subjective. The thresholds of impact are not quantitative, and thus very difficult to judge. It is troubling that most visual issues are judged by public impact and not private impact. Thus, the driving threshold established by the Scenic Highway Act is held much more important than the impact to private residences in the El Porto area. This is sad as it seems to ignore the sensitivity of those closest to the project. The use of the assessment, "would not substantial degrade" is extremely hard to evaluate and might be considered to be "white wash" by some. I am concerned that spillage of night-time lighting of the south site facility has not been sufficiently assessed and will be a continuing problem to residents of El Porto during the construction period and, long term, during the operations period. This lighting will be much nearer to residents, and comparison to the ESGS, Chevron and Hyperion plant area lighting is not relevant. Relative to Section 5.11: Marine Biological Resources I am concerned by a comment made by one of the representatives at the site discussion station (who was latter on the technical panel at 5/12/18 public meeting) who said that while the north site was the preferred location but because its



**Comment Letter CUNNINGHAM**

lower elevation relative to sea level there would be a concern by the Coastal Commission that might jeopardize the Commission's approval of the project. My concern is why the north site is touted as the preferred location when this potential road block has not removed by getting the Commission's tentative approval before moving forward to this point. I would suggest that significant effort be applied to become assured that the Coastal Commission will approve the plant at the north site before proceeding further with development of plans for that site. Relative to Section 5.12: Noise Regarding the south site, for both the Local and Regional implementations, should it be selected, I question the impact to residents in the El Porto area from seismic effects of pile driving during the construction phase. I don't think this environmental effect has received sufficient study relative to its potentially induced damage to nearby residences and the Chevron Service Station at the intersection of 45th Street and Vista del Mar. In general, this analysis has been written off because it is very complex to calculate and transmission of vibrations are impacted by boundary phenomena (that) are impossible to foresee.



**From:** West Basin  
**Sent:** Wednesday, April 25, 2018 8:25 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Thomas Davidov

**Mailing Address:** 425 26th St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3103510444

**Email Address:** tdavidov1@gmail.com

**Organization:** None

**Comments:**

Desalinization should only be pursued as a last resort. Why are we focused on capturing more rain water both in southern and northern CA. In addition we have the opportunity to build additional water capture facilities in norther California from the abundant river systems. If A desalinization plant must be built it should be as far from houses as possible.

DAV-1

Victoria Lynn DeFrank

420 South Catalina Avenue, Apt 219 Redondo Beach, CA 90277

310-848-

3701

victorialdefrank

@gmail.com

June 21, 2018

Patrick Shields, General Manager  
West Basin Municipal Water District Board of Directors  
17140 South Avalon Boulevard  
Carson, CA 90746-1296

Re: Draft EIR

Dear General Manager Shields:

I am deeply troubled by the information I received regarding the proposed desalination plant to be built in El Segundo. The draft presented identifies the current laws and regulations but does not explore or address the impact to the local community and the region.

DEF-1

It is my understanding that about 63 million dollars have been spent to date. What is the estimated final project cost? Who will be responsible for the cost of operating the facility? How does the building of a four-story plant with adjacent buildings align with the beauty and scenery of the proposed location? As described in the draft, the plan does not address the loss of beach access.

DEF-2

I would appreciate your responding to me at your earliest convenience. Because I resided in an industrial setting Western Pennsylvania I am acutely aware of ramifications that occur when a plan is implemented without considering the long term financial and environmental cost.

DEF-3

Sincerely,



Victoria Lynn DeFrank

## Comment Letter DELK

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/28/2018	Patricia Delk	764 36th Street	Manhattan Beach	CA	90366	This project is too close to homes. If you must, please opt for the Northern most location.

DEL-1

**From:** West Basin  
**Sent:** Friday, June 8, 2018 6:56 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Clinton D Dodd

**Mailing Address:** 211 Eastern Ave  
**City:** Pasadena  
**State:** CA  
**Zip:** 91107

**Telephone # (daytime):** 626 449-7536

**Email Address:** clinton@caltech.edu

**Organization:** None / Caltech retired

**Comments:**

I applaud the foresight of every city that is looking into desalination plants and every university that improves the process of removing salt from ground water. The future of pure drinking water and crop water needs the commitment.

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DOD-1  
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**From:** West Basin  
**Sent:** Monday, May 7, 2018 8:51 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Dina Doll

**Mailing Address:** 39th St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3108391166

**Email Address:** Dolldina1@gmail.com

**Organization:**

**Comments:**  
I STRONGLY object to the proposed South location. This will severely impact the value of many multi-million dollar homes. Which you might be liable for if there are any accidents such as the gas leak that occurred last year. A plant should no sxist so close to a residential area. I oppose the plant anywhere near El Porto.

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DOL-1  
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**From:** West Basin  
**Sent:** Saturday, April 7, 2018 5:57 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Lesley Dunlap

**Mailing Address:** 201 Gull Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 9495002219

**Email Address:** lesleydunlap@yahoo.com

**Organization:** None

**Comments:**

For the proposed desalination plant, I am against it. If it moves forward, it needs to be at the jetty near the smoke stacks. The Chevron plant keeps us up at night. If it goes behind the Chevron station, it will for sure prevent us from sleeping and affect our property values (ie class action lawsuit). It should be away from residential near the smoke stacks.

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├ DUN-1  
└

**From:** West Basin  
**Sent:** Tuesday, May 15, 2018 6:33 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Lesley Dunlap

**Mailing Address:** 201 Gull St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 9495002219

**Email Address:** Lesleydunlap@yahoo.com

**Organization:**

**Comments:**  
We do not want a desalination plant in our backyard/adjacent to El Porto. This is a horrible plan and should be rejected. We do not want to live next to another plant and should not be subjected to the noise, safety risk, pollution, eye sore and everything associated with living next to a plant.

┌  
└ DUN2-1



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

Sb

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Conner Everts

Mailing Address 2613 Gust Santa Monica CA 91316  
Street City State Zip

Telephone # (daytime) 310.804.6615

E-mail Address conner@gmail.com

Organization/Affiliation Desal Response Group

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

will provide oral comments - extension of DEIR dead line to June 25

EVE-1

To mail: fold, staple or tape together, and include a stamp.

Donald Dear (West Basin Board of Director) , Gloria Grey (West Basin Board of Director), Carol Kwan (West Basin Board of Director), Scott Houston (West Basin Board of Director), Patrick Shields (West Basin General Manager), Steve O'neil (West Basin Legal Counsel), Zita Yu (West Basin Staff), Julie Frazier-Matthews (West Basin Staff), Connor Everts (Desal Response Group) , Annelisa Moe (Heal the Bay), Amanda Sackett (Surfrider Foundation),

Donald: So, I'll call the meeting to order, the special board meeting of West Basin, and, uh, we – now a quorum of four. And, uh, under public content – comment, we have three requests to speak under agenda item 5B. Is anyone else with the public, wants to comment? Okay, we'll go on to presentations, there are none. Item 5A, I think 5B first, so we can move things along, if that's okay with you, and, uh, it was Connor Everts, I believe, is the first speaker.

Connor: Thank you very much. Connor Everts with the Desal Response Group. Um, I just wanted to refer to our, um, letter from our coalition asking for an extension of 30 days until June 25<sup>th</sup>. Um, for the comments, um, you all have, I know, worked very long and hard on putting together a draft EIR. Uh, we were having some problems. Um, one, downloading some of it, and then having access, the items, the [inaudible] [00:01:04], so we're asking for more time on that.

EVE-2

I also wanted to commend your staff. I realized that you weren't here, but for the first public meeting in El Segundo, we had a very large turnout. People wanted to speak and, uh, staff let them do it, and I thought that was a good interchange we had, a little contentious at times, but, uh, we appreciate that. And I also wanted to, um, commend you on your continuing, um, water barrels, uh, rain water workshops, and even the water bottle filling stations, and, uh, I think that helps, uh, us and you to interact with the public. Thank you very much.

EVE-3

Donald: Thank you. Who's next? Do we have who's next?

Julie: Thank you, Director Dear. The next speaker is Annelisa Moe.

Annelisa: Good morning, madam chair and members of the board. Um, I've met a few of you at this point, but I just wanted to introduce myself. My name's Annelisa Moe, uh, and I work with [inaudible] as a water quality scientist. Um, and on behalf of [inaudible] I just wanna reiterate some of, um, Mr. Everts comments that we would like to, um, be able to extend the comment period for the draft EIR, um, and also, commend you guys for the work that you have done. Um, I am new to a lot of this. I got hired about two months ago, but seeing some of the presentations this morning, um, it was, uh, great to see some of the projects that you guys are putting forward, so thank you very much.

Donald Dear (West Basin Board of Director) , Gloria Grey (West Basin Board of Director), Carol Kwan (West Basin Board of Director), Scott Houston (West Basin Board of Director), Patrick Shields (West Basin General Manager), Steve O'neil (West Basin Legal Counsel), Zita Yu (West Basin Staff), Julie Frazier-Matthews (West Basin Staff), Connor Everts (Desal Response Group) , Annelisa Moe (Heal the Bay), Amanda Sackett (Surfrider Foundation),

Steve: Uh, sure. The, uh, this is the time where the agency is taking comments and we're in the, in the preparation phase of – or, excuse me, we're still receiving comments that we're gonna have to respond to. We expect that to be a pretty lengthy period with a lot of comments and that is a staff activity. The staff and our experts have to get together and respond to those comments. The board will be the ultimate arbiter of whether or not the, uh, document will be finalized and, and a project, uh, accepted.

And so, at this point, uh, our recommendation is that the staffs continue to, uh, staff the workshops, take input, and receive comments that we will add to the admin record that'll be the record underlying the final document in the project.

Julie: Mr. Chair?

Donald: Before you, you comment, I'm gonna give another minute to Connor Everts if he has something to say, if you don't mind.

Connor: Since the public doesn't come here, I thought it was a good opportunity. My other question was, I didn't know if there was a, a, recording of the comments that were made when people got up and spoke. I know that you hand out those short sheets that people could, um, put written comments on, but if you were actually recording, because how else are the board gonna know with the 50 or 60 people that were there that night, let's say? Thank you.

EVE-4

Donald: Respond to that?

Patrick: Yeah, uh, comment cards were filled out by the participants and those will all be incorporated as part of the, uh, EIR process and addressed, and, uh, our, um, project manager, Zita, if you wanna add anything to that, of how this – those comments are gonna be handled.

Zita: Thanks, uh –

Patrick: Two mics.

Zita: Well, it works now. Thank you very much, uh, Mr. [inaudible] [00:07:39]. Uh, yes, uh, so, uh, the public, uh, public meeting that was planned for the, uh, April 25<sup>th</sup> meeting, uh, the original plan

Dr. Sarah J. Feakins  
Resident within West Basin MWD  
228 38<sup>th</sup> Pl, Manhattan Beach  
CA 90266

23<sup>rd</sup> June 2018

Re: Public Comment on West Basin Seawater Desalination Proposal Draft EIR  
<http://westbasindesal.org/draft-eir.html>

To whom it may concern,

I am writing to participate in the public comment period on the West Basin Draft EIR issued March 27<sup>th</sup> 2018. I attended the first public town hall meetings during the public comment period. The meeting was revealing about the process. I thank the decision of the West Basin staff to follow their powerpoint presentation with a session in which they publicly (rather than 1-on-1 as planned) answered public concerns which is the expected format of a ‘town hall’ meeting. West Basin’s 1-on-1 conversations were also very informative, but the public Q&A is vital for the community process of discussion to understand, and to know what questions to ask from other members of the community. This is also important to the CEQA mandated process of public information sharing, because the burden of time needed to read about the CEQA process and Draft EIR is considerable, and therefore inaccessible to most of the public.

FEA-1

- How many hours does it take to read the complete draft EIR?
- Please include an FAQ section that answers most common questions from the public.

My comments are informed by my reading of the climate research literature, as well as educational materials related to energy and water security. I do not conduct research on desalination or any aspect of water supply and do not have any financial conflicts of interest.

I recommend the Pacific Institute report that describes the key issues and concludes that desalination proposals are premature in California. <http://pacinst.org/publication/desalination-with-a-grain-of-salt-a-california-perspective-2/>

FEA-2

As stated in the Draft EIR documentation “The purpose of the draft EIR, is to **seek public comment to inform and refine the proposed project**. Following the close of the public review and comment period, West Basin will respond to all comments submitted **in regards to the adequacy of the draft EIR.**” My comments are on the adequacy of the draft EIR, by section, and I seek response.

**Draft EIR Section 2. Introduction and Background**

Desalination of seawater is one of the most expensive and energy-intensive ways of delivering water. This is relevant to the adequacy of the EIR, because costs spent on mitigation of EIs are part in the costs of construction and costs of production. Costs certainly are relevant to discussion of water security in background information section of the Draft EIR and foremost concerns to most at the town hall meeting, although those public participants were only from the informed pool of local neighbors and not representative of the West Basin customer base (not directly notified), that includes larger volume water users in places, and low-income communities in others, I urge price and socioeconomic impacts to be clearly reported.

FEA-3

- a. What is the cost of construction of the plant, and what is the estimated total cost per average water rate payer over the mortgage period of 25yrs to pay back the cost of construction?
- b. What is the cost of water/HCF (HCF=100 cubic feet) from this plant to homeowners at the current cost of energy, and projected 10 years ahead? Please detail this for the average water rate user in a variety of types of housing: the average customer in different cities served, in the large garden properties, and where water price is bundled into rents, what are the impacts.
- c. Please provide a clear report e.g. graphic that shows the cost of the various types of water in West Basin’s proposed water portfolio at today’s costs vs desalination.
- d. Project proponents should estimate and publicly disclose the full energy requirements of each proposed project and provide details of energy contracts. (Pacific Institute recommendation). Please provide a clear report e.g. graphic that shows the cost of the various types of water in West Basin’s proposed water portfolio at today’s costs.
- e. Project proponents should explicitly evaluate energy price risk, including year-to-year variation and trends over time. (Pacific Institute recommendation) i.e. please show projected costs and uncertainty in projected cost comparisons.
- f. To what extent has West Basin attempted to reduce water use by large volume residential users? (alternative to expanding water supply)
- g. In low-income communities will the rise in water rates have health consequences?
- h. Is it correct that cost is the main concern of the average attendee of the West Basin town hall meeting? If so has expected price per resident been adequately communicated to all residents?

FEA-4

FEA-5

FEA-6

FEA-7

FEA-8

**Draft EIR 5.15 Transportation and Traffic.**

The El Segundo locations are on an artery that has no close parallel roads because of multiple large industry properties, this road is a major conduit between the “South Bay” and “Silicon Beach”. Traffic congestion on this artery road further N, recently was the place of a reversal of a road diet/parking change that reversed under public pressure.

FEA-9

- a. Is it correct that this is a prevalent concern among local residents based on the responses at the town hall meeting?
- b. Please include reports on the road condition and road resurfacing after the truck traffic needed for construction, although the report considers traffic delays for truck traffic (3 car equivalent length) it does not factor road damage from weight of loaded trucks. See for example <http://www.governing.com/topics/transportation-infrastructure/Too-Big-The-Road.html>
- c. Does the traffic delay report account for trucks making left turns out of the property across a dangerous stretch of road with several high speed collisions in the last year. Equating traffic burden to 3 car equivalent addition to traffic, appears insufficient given that the traffic flows N-S 2 lanes each way, travelling past the proposed Vista del Mar sites, with the N-bound accelerating downhill from 30 to 45 miles per hour (or faster). The proposed site would introduce need for cross lanes, truck pull out, given the turning radius, time needed, can that pull out occur safely without traffic lights and what would traffic lights add to the traffic delay?

FEA-10

FEA-11

FEA-12



- d. Please factor the timeline for road resurfacing into traffic delays associated with restrictions along the artery road Vista del Mar. Include estimates of the time increase for alternate routes if detours are needed via Rosecrans and Sepulveda and Aviation.
- e. Given the unique artery road in El Segundo, the community impacted will include the larger South Bay commuters linking to businesses in the Silicon Beach and West Side regions, an adequate CEQA public comment would take into consideration public information and comment on EIR from that community, e.g. note reversal of lane and parking changes on the Vista del Mar.  
<https://www.dailybreeze.com/2017/08/10/second-lawsuit-filed-over-vista-del-mar-road-diet/>
- f. Please document how communities and business that will also be impacted by travel delays have been (in)sufficiently notified of the draft EIR.

FEA-13

FEA-14

**Draft EIR 5.11 Marine Biological Resources**

- a. Please confirm whether this report was consulted and what aspects of the recommendations were adopted/not:  
<http://pacinst.org/publication/desal-marine-impacts/>
- b. The draft EIR report details the cetacean species that are common in the vicinity. I confirm frequent (daily) casual sightings of pods of 6-12 dolphins are readily spotted nearshore in the El Segundo location, a whale has also been spotted in this location, based on casual observation. The report mentions the mammals are protected, but does not detail all the risks, in addition to brines and intake/outflow engineering that are covered. I find that acoustic risks to species using echolocation in the vicinity are missing, for information: <http://www.environment.gov.au/marine/marine-species/cetaceans/whale-dolphins-sound>. Please detail the direct risks of sound and brines to the pod of dolphins that are offshore on a daily basis, just beyond the surfers, as well as the indirect, local impacts on their food chain. For example of sub-marine acoustic EIR see this from Aquasure in Australia:  
<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=12&ved=0ahUKEwJP7-ziterbAhVK-IQKHYzaCb0QFghsMAs&url=https%3A%2F%2Fwww.aquasure.com.au%2Fuploads%2Ffiles%2FD%26C%2520Marine%2520EMP%2520Att%2520I7%2520-%2520Underwater%2520Noise.pdf&usg=AOvVaw1VNmslxMmaDf1NrksTVO8g>

FEA-15

FEA-16

**Draft EIR 5.5 Energy.**

Is there any issue with the water cooling for the power plant and the proposed desalination plant, related to regulations associated with permitting and extension of permit life for power plant coolant?

FEA-17

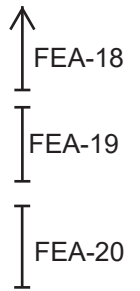
**Draft EIR 5.6 Geology, soils, seismicity.**

- a. I searched the Draft EIR, but I found no mention of sea level rise projections, and property lines and structural integrity of the plant and lines, with respect to a shifting shoreline, and wave erosion. Information about projections and city planning here:  
<https://dornsife.usc.edu/uscseagrant/adaptla-va/>  
<http://smdp.com/rising-sea-levels-santa-monica/155078>

FEA-18

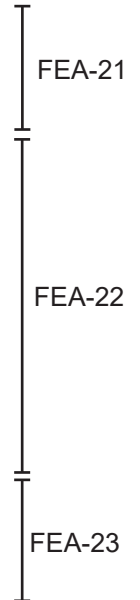
<https://la.curbed.com/2017/3/28/15089548/southern-california-beaches-erosion-disappear-by-2100>

- b. The power plant at the El Segundo property has recently installed a seawall presumably for this reason, please provide analysis of this structure’s (in)sufficiency, relevant to the proposed construction in the final report.
- c. To what extent has the EIR followed the Pacific Institute recommendation: “Planners should design and construct all desalination facilities using estimates of future, not present, climate and ocean conditions.”



**Draft EIR 5.7 Greenhouse Gas Emissions.**

- a. Please see the Pacific Institute report prepared on this topic.  
<http://pacinst.org/publication/energy-and-greenhouse-gas-emissions-of-seawater-desalination-in-california/>
- b. **Carbon dioxide emissions associated with desalinated seawater production.** If 50% of California’s electricity is derived from coal, purchased from out-of-state, this means that 50% of the desalination plant’s considerable energy will be coal-fired, with other sources of energy including gas contributing to the carbon dioxide emissions. Please provide a clear graphic that shows the carbon dioxide emissions associated with the various types of water production in water portfolio, and range of carbon dioxide emissions associated with a fluctuating energy mix, this is information needed to make an informed choice with the final EIR as to the carbon dioxide emissions and climate change associated with this proposal.
- c. **Construction materials – carbon dioxide emissions.** Please include the carbon dioxide emissions associated with the required building materials (concrete etc), not just the carbon dioxide cost of transporting those materials for the plant construction.



**Draft EIR Section 6. Other CEQA Considerations.**

**Public information and consultation adequacy.** Direct mail notifications only went to residents within North El Porto. This means no direct information has been supplied to the 900,000 residents within the area served by West Basin, this omission would interfere with the public comment requirements of the CEQA process, given the considerable cost that will be on their water bill and that may impact those communities negatively.

The town hall meeting venue was full, but also a very small venue. I do not find adequate demonstration of democratic participation in what is a very costly project, estimated >\$300m cost of construction, to be spread mortgaged out over 25 years, to the 900,000 residents of West Basin district, or to residents and businesses impacted by the traffic changes, or to the larger communities impacted by the energy-cost of seawater desalination.

In the final report please provide the following information about public dissemination of information:

- d. How many public attendees were present at meeting 1, meeting 2, and how many in total non-repeat names signed in to the available public information town halls?
- e. How many public comments were received in total?
- f. What % of the West Basin customer base does this participation represent?
- g. Please document that the public comment period was extended as requested by 1 participant in the first public comment meeting, after it was deduced that there would



be no West Basin executive board meetings during the remaining public comment period, giving the public no access to the board. Please document how many public attendees were at the board meeting.

- h. Transparency. For the 5 voting members of the board, please declare any prior lobbying activities or ties to seawater desalination industries that may constitute conflicts of interest, including financial or personal benefits from the proposed plant construction. These data are key to document to what extent awareness and comments received may **adequately ensure the integrity of the public comment part of the CEQA process.**

↑  
FEA-26

**Draft EIR Section 7. Alternatives to the Proposed Project.**

Insufficient alternates are presented, others including water use reduction and scale-up of wastewater treatment are missing. Options are presented for different site locations or no action. Seawater desalination, is considered a water provision option of last resort, because of the high costs, and high energy demands. It is used in the Middle East where oil is abundant and freshwater scarce, but in California, we have abundant water resources, that we move around the state, and we can instead prioritize: aggressive conservation in agriculture (the major water user in the state, at 80%), urban conservation, wastewater reclamation: treatment, reinjection, and using this banked water for later indirect potable reuse. This proposal puts a trickle of water in our taps at huge dollar and carbon costs.

FEA-27

The Pacific Institute report recommends:

“Water planners, agencies, and managers must comprehensively analyze all options, including conservation and efficiency, and pursue less costly, less environmentally damaging alternatives first.

Desalination facilities should be approved only where water agencies have implemented all cost-effective water conservation and efficiency measures.”

FEA-28

I oppose the seawater desalination proposal.

Sincerely,

Dr. Sarah J. Feakins

Resident: Manhattan Beach

Employment: Associate Professor of Earth Sciences at the University of Southern California.

**From:** Mike Ferniany  
**To:** [West Basin Desal EIR](#)  
**Subject:** Desalination Project  
**Date:** Thursday, March 29, 2018 4:49:36 PM

---

Environmental Impact:

Putting a plant in El Segundo is a potential environmental disaster. Vista Del Mar is a very crowded major street the entire year, with not only continuous beach traffic but also the primary street for traffic for people going and coming from work for all the beach cities. Additionally, the Chevron facilities are continually constructing which disrupts and delays traffic flow on Vista Del Mar. Additionally, the city is continually doing road repair and/or digging up the street to get to the sewer pipes, etc. It's a continual traffic nightmare for those of us who live in this area.

FER-1

Please do not build or put a plant in this already congested area with constant tourist and Los Angeles beach-goer traffic.

Why don't you build this plant at a different location such as San Pedro or Long Beach? That makes more sense than crowding out the already too-crowded.

FER-2

Sincerely,  
Michael Ferniany

**From:** West Basin  
**Sent:** Tuesday, April 24, 2018 1:07 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Barbra Fontana

**Mailing Address:** 534 Rosecrans Avenue  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Barbrafontana@aol.com

**Organization:**

**Comments:**

I am opposed to the desalination plant in North Manhattan Beach/ South El Segundo. Studies show that it is extremely expensive and could affect the ocean life. I think if anything it should be moved further North in El Segundo and line up with the Hyperion Plant that is already affecting Beach, etc.

┌  
FON-1  
└

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 5:49 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Christopher Forrest

**Mailing Address:** 209 41st Street  
**City:** Manhattan Beach  
**State:** PA  
**Zip:** 90266

**Telephone # (daytime):** 2679094627

**Email Address:** cbforrest1@gmail.com

**Organization:** Home Owner

**Comments:**

We are fully aware of the need for Southern California to develop new sources of clean water. We are not happy about the environmental impact of the Desal plant should it be located in El Segundo. There is no question that it will have a negative impact on an already fragile ecosystem. It seems to us, though, that the decision to build the plant is foregone. If that is the case, I would like to comment on plant location. If the plant will be located on the power plant site, there is no question that the Northern site would be preferred. Removal of the old smoke stacks is a huge plus for all of us in South Bay, and replacing those with a Desal plant from an aesthetics point of view would be a gain. Placing the Desal plant on the South side of the lot would be a huge problem for the northern Manhattan Beach community: the smoke stacks would remain, the location of the plant would be so close to our neighborhood that there may be unintended health effects, and the impact on our well-being would be tremendous. -- Chris Forrest

FOR-1  
FOR-2



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Dean Francois

Mailing Address By 15th Yerma Beach CT 0620X  
Street City State Zip

Telephone # (daytime) 310-938-2171

E-mail Address Save the strand@yahoo.com

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

- 1- Alternatives consider using Hyperion Discharge & change to state law to allow this. FRAN-1
- 2- Concern re: affect on wildlife FRAN-2
- 3- Throw out alternative for Redondo - that is not a real FRAN-3
- 4- Consider alternative of getting population to reduce excess waste of curial water ie; we still allow waxy cars in streets, peoples discharges of swimming pools; street cleaning still not implemented in San Pedro; get car washes to have and use soapless alternatives FRAN-4

To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Dean Francois

Mailing Address By 1549 Hemlock CA 90254  
Street City State Zip

Telephone # (daytime) 310 - 938 - 2191

E-mail Address save the strand@yahoo.com

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

I South Site proposal is a violation of CA Coastal Act. as it ① Blocks public view of the Ocean from the existing street and parking lots.

FRAN2-1

② Demograds the view of the Beach from the water's edge

FRAN2-2

II Buldy's need to be consolidated more @ Hikes, underground, pushed back away from water

To mail: fold, staple or tape together, and include a stamp.



**From:** West Basin  
**Sent:** Thursday, April 5, 2018 9:12 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Robert Fraser

**Mailing Address:** 201 43rd St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 650-468-7012

**Email Address:** rfraser4@gmail.com

**Organization:** Homeowner - El Porto

**Comments:**

If the case for a de-sal plant is compelling (which I am not qualified to speak to), then I would strongly prefer the North vs. the South site. The North site would have much less impact on nearby residents as very few people use the beach in that area, vs. the South site where there are many beach goers and homes right nearby. Thank you, Rob Fraser

FRAS-1

## Comment Letter FREEMAN

**From:** ROBERT FREEMAN  
**To:** [West Basin Desal EIR](#)  
**Subject:** A Vote for Desalination  
**Date:** Friday, June 22, 2018 2:50:56 PM

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May I add my name to the list of people who favor the desalination of water from Santa Monica Bay and also approve of returning the resulting effluent to the bay. I believe the engineering needed to insure that the effluent would not harm the bay is well understood and would be used to insure the bay's safety. No one wants to harm the environment and the people who oppose such a solution seem to me to be following the rhetoric of alarmists who simply do not want to take any steps to solve the water shortage. If they prevail it seems inevitable that Los Angeles would become an undesirable place to live.

FREE-1

Robert A. Freeman  
611 Esplanade  
Redondo Beach, CA 90277

Sent from my iPhone

Justin Sumi

From: West Basin <comments@westbasindesal.org>
Sent: Monday, June 25, 2018 5:01 PM
To: Noemi Luna
Subject: West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

Name: Scott Frego

Mailing Address: 318 Gull Street
City: Manhattan Beach
State: CT
Zip: 90266

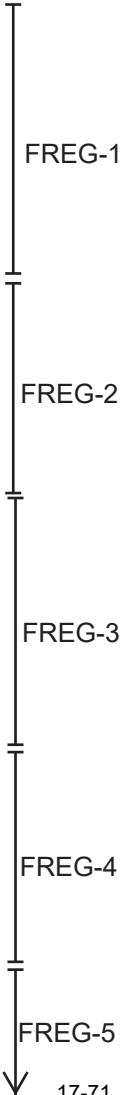
Telephone # (daytime): 310-545-3597

Email Address: scott@toroaire.com

Organization:

Comments:

To whom it may concern: As a long time Manhattan Beach resident, I've seen a lot of changes to the community. Most have been positive, but this proposed Desalinization Plant would be the worst change that has happened to our community in my time here. Here are my thoughts and comments: - This project is supposed to take 3-1/2 to 4 years to complete. As someone who works in the construction industry, I'm almost certain that there will be issues that will make that timeline longer (it's the nature of the beast in long, drawn-out projects). That's 4+ years of dirt, noise, and extra traffic we North Manhattan Beach residents will have to experience. Would anyone on the board making this decision be ok with these issues if it was being done next to their home? - Speaking of dirt, I'm extremely concerned (a bit frightened to be honest) of the contaminated soil at the site that will need to be removed. The prevailing winds are always coming out of the west/northwest, which means our community will be subject to inhaling whatever toxicities and cancer causing soil you are removing. How do you assure residents that we won't be affected by this at all? Will we be told, it's ok, we will take measures to ensure none of this dirt gets airborne or affects anyone in the area; only to have a slew of residents developing unexplained cancers 15 years from now? - Noise is going to be a huge issue. Not just during the construction, but after everything is done. Some may say there are industrial building already in the area; however these building will be the closest to our community. And I'm not talking about whatever noise emits from the plant from the desalinization equipment. These buildings will all need HVAC, which means noise from exhaust fans, supply fans, air handlers, etc.. All of this equipment will be placed outside of these buildings and will emit noise, and you will need dozens of these types of units in order to provide ventilation to these buildings. Has anyone accounted for the noise that this equipment will bring to our neighborhood? - I'm not sure why the board is so vested in a desalinization plant, when there are other, less expensive methods to help SoCal with obtaining water. I'm amazed to see the LA River dump billions of gallons of fresh rain water into the Pacific Ocean every time we have a storm. Why isn't that water captured, filtered, and used? By doing this, you would help solve the water issue and also help prevent the South Bay from getting polluted every time all of this storm drain water dumps into the Ocean. Seawater desalination is the most expensive and intensive energy consuming way of getting useable water, while completely ignoring the other less expensive and less intrusive ways of providing the water needed. - Why isn't this plant being built at Hyperion, which already has a large facility that could accommodate all of this. I was told during one of the meetings that the reason that this location is being selected is because there already is an existing intake pipe there. Well, why don't you build the plant at Hyperion and connect to the



**Comment Letter FREGO**

intake pipe from there? Sure, it would cost more money, but at least the issues I've outlined above would go away. Perhaps some of the construction costs would be lessened if you could remodel some of the facilities there to accommodate this project rather than creating new buildings. It's almost always cheaper to remodel existing than build new. Also, there is a huge vacant plant down in Redondo Beach that could accommodate this facility - why isn't that considered? The residents there wouldn't be affected since the facility already exists. In closing, I hope that the board rejects this plan and looks at other alternatives for solutions to our water reclamation efforts. Thank you, Scott Frego 318 Gull St. Manhattan Beach, CA 90266



**From:** West Basin  
**Sent:** Thursday, April 12, 2018 10:39 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Robert Gallman

**Mailing Address:** 201 Moonstone st.  
**City:** Manhattan Beach  
**State:** CO  
**Zip:** 90266

**Telephone # (daytime):** 310-200-7936

**Email Address:** deangallman@aol.com

**Organization:** Local resident

**Comments:**

West Basin Municipal Water District 17140 South Avalon Blvd. Carson, CA 90746  
Attn: Zita Yu, Pd.D., P.E., Project Manager Subject: Proposed Ocean Water  
Desalination Project (SCH # 2015081087) Dear Doctor Yu, I am a property owner  
residing in North Manhattan Beach that would like to express my opinion on the two  
proposed site locations in El Segundo. Please choose the one that's further north of  
45st. street. The further away from 45th street the better. The closer to 45th street,  
the greater the overall loss in property value will be for all the residents of North  
MB. All residents here oppose having their residence any closer to a large scale  
industrial zone as possible as you must imagine. When there's a choice please  
consider this overwhelmingly important point. In your pursuit of materializing either  
of these site locations for the plant's final location, choose the site furthest North of  
our residential neighborhood. That's the path to least resistance and would be most  
appreciated. Sincerely yours, Robert Gallman 201 Moonstone St. Manhattan Beach,  
CA 90266

GAL-1

**From:** West Basin  
**Sent:** Tuesday, April 24, 2018 1:35 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Carrie Gilmer

**Mailing Address:** 2113 N Meadows Ave.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3103834445

**Email Address:** ckgilmer@gmail.com

**Organization:** none

**Comments:**

Desal is potentially disastrous for our bay/environment and is incredibly expensive. I am concerned that you have not fully explored all other options. I also would HATE to see you locate the plant next to a swimming beach (the southern site option). If you must go through with this, please go with the northern site. Carrie Gilmer

┌  
└ GILM-1

**From:** West Basin  
**Sent:** Friday, April 6, 2018 6:34 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** STEVE

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):** 8183892681

**Email Address:** stevegilmour@yahoo.com

**Organization:**

**Comments:**

While I am completely opposed to the desalination plant for environmental reasons, it has to happen, the most logical place is the north site. There absolutely is no logical reason to put it on the south site at 45th.

GIL-1

**From:** West Basin  
**Sent:** Saturday, April 7, 2018 8:13 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Steven

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** steven@jdgilmour.com

**Organization:**

**Comments:**

Please do not put in the desal plant. There are so many other ways to achieve your goals without the plant. If you absolutely must put it in, the north site near the jetty is a must. It makes zero sense to have it anywhere near the proposed south site. Thank you.

┌  
└ GIL2-1



Margaret D. Grant  
341 29<sup>th</sup> St.  
Hermosa Beach, CA 90254

June 18, 2018

Mr. Patrick Shields, General Manager  
Honorable Members of the Board of Directors of the West Basin Municipal Water District  
West Basin Municipal Water District  
17140 South Avalon Blvd.  
Carson, CA 90746-1296

Dear Mr. Shields and Members of the West Basin Board of Directors,

Ré.: Response to Draft EIR

I understand that you are soliciting community responses to the Draft EIR for the proposed desalination plant on the coast in El Segundo. I have concerns about the proposal, specifically the following:

Why does the proposal not address the use of renewable energy?

GRA-1

What are the impacts of discharging the resultant brine into the ocean along our coastline?

GRA-2

How will the project comply with ocean and coastal impact, and (drinking) water quality, laws and regulations?

GRA-3

Thank you for your consideration of my concerns. I look forward to your response.

Sincerely,



Margaret Grant

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 1:59 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** David Gurewitz

**Mailing Address:** PO Box 1267

**City:** Kilauea

**State:** HI

**Zip:** 96754

**Telephone # (daytime):** 808 635-5827

**Email Address:** dmgbeachlaw@hawaii.rr.com

**Organization:** El Porto Property Owner

**Comments:**

Gentlepersons: I own the property at 126 El Porto St. I am against constructing the desalination project adjacent to 45th Street (the "South Site"). The South Site is literally on top of the El Porto residential community, and construction of the project at the South Site will significantly interfere with the health and welfare of the El Porto community residents in, among other things, creating excessive environmental and noise pollution and extraordinary traffic problems. The other location for the project being considered (the North Site) is non-residential. It simply does not make any sense to construct the project next to a residential area when a better, non-residential area is available.

GUR-1

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 2:13 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Felipe Gutierrez

**Mailing Address:** 5302 W 123rd Place  
**City:** Del Aire  
**State:** CA  
**Zip:** 90250

**Telephone # (daytime):** 3105673725

**Email Address:** felipe425@gmail.com

**Organization:** Otis College of Art and Design

**Comments:**

My family, lives, works, and attends school in the South Bay so we support diversifying our clean water sources in addition to robust conservation.

GUT-1

**From:** Mary Hardin  
**To:** [West Basin Desal EIR](#)  
**Subject:** Comments on DeSal plan EIR  
**Date:** Friday, May 25, 2018 1:55:47 PM

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Dear West Basin,

I've reviewed the EIR for the proposed desalination plant and I urge you to rethink this project. Desalination is expensive, it uses too much energy, it hurts marine life and is environmentally destructive to our coast. The process takes too long as well. There are better ways of addressing our water needs like conservation and rainwater capture. Put your focus on fast-tracking the recycling of highly treated wastewater from Hyperion and other plants.

HARD-1

I live near this proposed project and it will negatively impact our community. Please find better options.

HARD-2

Thank you,

Mary Hardin  
Playa del Rey Villas HOA  
328 Culver Blvd  
Playa del Rey, CA 90293

**From:** West Basin  
**Sent:** Friday, May 18, 2018 11:39 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Susan Harris

**Mailing Address:** 121 43rd Street  
**City:** MANHATTAN BEACH  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** slh121@aol.com

**Organization:**

**Comments:**

My neighbor articulated my thoughts exactly in an open letter to local paper: The desalination plant is to be sited in the South Bay because the West Basin Municipal Water District's outside consultants think we are the armpit of Los Angeles, so a little more environmental damage won't hurt us. At public meetings they argued that the massive oil refinery, two power plants and a sewage treatment plant make the South Bay the only logical spot to add another industrial plant that will pollute our air and foul our ocean. We might opt to sacrificially eat the increased air, ocean and noise pollution if desal were necessary but it appears to be a \$360 to \$600 million-dollar boondoggle instead of a sensible solution for West Basin rate payers.\$63 million has already been spent just studying the possibility of a plant. This sunken cost must be ignored to fairly decide whether a desal plant is useful or necessary. Los Angeles Waterkeeper says, "Seawater desalination is the most expensive and energy-intensive option for LA's water". It causes the most environmental degradation of all options. It creates more global warming while other much cheaper options reduce it. It may be necessary someday. It is manifestly unnecessary today. We must listen to the scientists at Heal the Bay, L.A. Waterkeeper, Surfrider Foundation, etc. and reject desal in favor of cheaper, more environmentally-friendly alternatives, of which there are plenty. Comments may be filed on the draft Environmental Impact Report at <http://westbasindesal.org/draft-eir.html> until June 25. Please learn all you can and join the fight to preserve our coast. -Michelle Murphy, Manhattan Beach

HAR-1  
HAR-2



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Emanuel Hirsch

Mailing Address 604 27<sup>TH</sup> Street Manhattan Beach CA 90266  
Street City State Zip

Telephone # (daytime) (310) 968-2041

E-mail Address manny.hirsch@voyagercourt.com

Organization/Affiliation Property Owner - North Manhattan Beach

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

See Attached Sheet

Multiple horizontal lines for writing additional comments.

To mail: fold, staple or tape together, and include a stamp.

I am a property owner in North Manhattan Beach (El Porto). I would not object to constructing the desalination facility at the proposed North Site. If the plant were to be placed at the South Site I would be opposed for the following reasons:

**Construction Noise:** The site is across the street from densely populated area and the four years needed to complete the project will cause an unavoidable impact on the residents.

**Operating Noise:** Again the site is very close to large numbers of people and mitigating noise and pump vibrations is going to be almost impossible.

**Construction traffic:** During construction Vista Del Mar Ave. will be reduced to one lane each way. If this occurs at the traffic light at 45<sup>th</sup> Street, only one lane will get through on each 'green' doubling the south bound traffic wait time. Building further north will allow two south bound lanes to cross the intersection.

**Air Pollution:** Dust and other contaminants generated by construction will impact large numbers of people living in El Porto.

**Aesthetics:** At the North Site replacing a Steam Generating Plant with a Desalination Facility will have no effect on anyone. At the South Site placing an industrial facility across the street from a residential area is not good land use planning by any criteria.

Thank you for your interest.

HIR-1



West Basin Municipal Water District  
**Ocean Water  
 Desalination Project**

Comment Letter HOPWOOD

**Comment Card**

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) MARSHA D. HOPWOOD

Mailing Address 1156 9TH ST, MANHATTAN BEACH CA 90266  
Street City State Zip

Telephone # (daytime) (310) 374-3255

E-mail Address m\_hopwood@msn.com

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Monday, June 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

I fully support the Ocean Water Desalination Project and the construction and operation of a desalination plant at the northern El Segundo site. While I understand the requirement in an EIR to show alternatives to the water desalination project, I believe that the EIR should go further to emphasize that the desalination project is not being proposed just as an alternative to other options. Most of the public comments I have heard or read seem to say either pick another option or we have an adequate water supply. It is important to emphasize that a desalination project would be in addition to some or all of the other options. Further, it would have the added benefit of being a local source, not subject to competing demands from other regions and states and not reliant on transportation over long distances.

HOP-1

To mail: fold, staple or tape together, and include a stamp.



**From:** Jasaitis  
**Sent:** Wednesday, March 28, 2018 8:09 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Jasaitis

**Mailing Address:** 204 43rd St  
**City:** Manhattan Beach  
**State:**  
**Zip:** 90266

**Telephone # (daytime):** 310-930-7442

**Email Address:** Jasaitis@lareminc.com

**Organization:** Resident of El Porto

**Comments:**

I've been a resident of El Porto for 30 years now. Living on 43rd St, we've been neighbors to the refinery and power plant, putting up with their never-ending demolition and development projects. We already have in our neighborhood sight lines exhaust stacks with annoying red lights that flash on and off into the night, tank farms, invasive power distribution towers, not to mention any latent health hazards associated with having residences so proximate to industrial complexes of this type. To now propose the development of a desalination plant is the last straw. What new unknown risks will this industrial complex bring to our neighborhood? What types of intrusive structures will newly invade our already impacted sight lines? How many years of construction activity will have to be borne by the immediate neighborhood? These projects seem to get approved all the time without taking all these factors into account. Enough is enough! The people of EL Porto vote a resounding "NO" to your proposed project. There are likely many better locations to propose for this development that wouldn't impact residential communities as much. But I'm sure these locations are likely less economically attractive to the developers, so we're stuck with fighting this in our back yard. Who will be our leaders in opposition to this invasive development? Will it be our Mayor? Our Council Members? I guess we'll see. Jay Jasaitis [jjasaitis@lareminc.com](mailto:jjasaitis@lareminc.com)

JASJ-1

**From:** Jay Jasaitis  
**To:** [West Basin Desal EIR](#)  
**Cc:** [Dalia Jasaitis](#); [Jay Jasaitis](#)  
**Subject:** Desalination Plant Proposed Development  
**Date:** Saturday, June 23, 2018 9:02:54 PM

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Ladies & Gentlemen,

As a long time resident of El Porto (30+ years on 43rdSt), I have no objection to the desal proposed development as long as it does not adversely affect the ecosystems of our beautiful bay. And that’s for the real environmental experts to address.

JASJ2-1

However, I am very much against locating this plant across the street from our residential neighborhood at 45th Street. This is very ill-advised, to say the least. Residential and industrial uses are not compatible and don’t co-exist very well. That site, which is now a parking lot, in its former life was a tank farm. When the tank farm was abandoned years ago, residents of El Porto, especially on 45th Street, cheered this development for obvious reasons. Creating a buffer between heavy industrial and residential is always welcome, for obvious reasons. To now contemplate redeveloping this site with an industrial plant is clearly a step backwards, and totally unnecessary in light of the alternative locations available.

Why would you subject our neighborhood to 2+ years of construction activity and inevitable upgrades downstream when we already endure what sometimes seems like an endless parade of construction related to the existing industrial complexes in the neighborhood. Recently we’ve dealt with the gas line installation in Highland/Rosecrans and upgrade of the power line towers along the same route. With this proposed plant development, we’ll have to deal with more of the same. Could you finally give us just a little peace here???

JASJ2-2

In summary, if this project is merited, there are far less intrusive locations for the development than across the street from our residential neighborhood on 45th Steet. I hope your decision-making group and our elected El Segundo and Manhattan Beach officials understand our concerns and make sure that the plant, if developed, is located at another site less intrusive to our residential neighborhood.

Sincerely,

Jay Jasaitis  
PRINCIPAL

LAREM Industrial Real Estate Specialists, Inc.  
165 Savarona Way, Carson, California 90746  
DIRECT 310.436.6487 CELL 310.930.7442  
[jjasaitis@lareminc.com](mailto:jjasaitis@lareminc.com)  
CalBRE LIC. #00865169  
[lareminc.com](http://lareminc.com)

## Comment Letter JASAITISM

**From:** Maria Dalia Sofija Jasaitis  
**To:** [West Basin Desal EIR](#)  
**Subject:** Proposed site for desal plant.  
**Date:** Wednesday, June 20, 2018 1:24:11 PM

---

I have attended all the applicable proposed desal plant meetings. I have been a resident of the El Porto neighborhood of Manhattan Beach for thirteen (13) years. I am opposed to building a desal plant at the 45th Street site. It is too close to the residential area. The tank farm was eliminated after many years. I believe that the industrial use would be incompatible next to the residential use. It would impact our neighborhood.....air quality, noise, view, home values, beach use, etc.

JASM-1

There is another location further down on Vista del Mar amidst existing industrial uses. I propose that if the desal plant is to be built, that it be built at that location. That location will not impact our neighborhood.

Thank you for your consideration.

Sincerely,

M. Dalia Jasaitis  
205 Sea View Street  
Manhattan Beach, California 90266

Cell: (310) 387-0605

Sent from my iPhone

## Comment Letter JOHNSON

Date	Name / Email	Address	City	State	Zip Code	Comment
4/7/2018	Dave Johnson	402 20th St.	Manhattan Beach	CA	90266	Please put the plant the most north of 45th in Manhattan Beach, where the smoke stacks already are. Replacing a plant with another plant has the least amount of impact on the area.

JOH-1

**From:** West Basin  
**Sent:** Sunday, April 29, 2018 3:45 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Karen

**Mailing Address:** 1140 Keats St.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310-251-0238

**Email Address:** Marnina1@earthlink.net

**Organization:**

**Comments:**

I believe the south site is an inferior choice. It affects lots of people who live near the proposed desalination plant in El Porto and Manhattan Beach. The north site has no homes or people near it. The impact is far greater for the south site than the north site. The report also mentions that the north site would be best in the long run. Please locate the desalination plant on the north side away from people!!

KAR-1

**From:** West Basin  
**Sent:** Tuesday, April 10, 2018 3:00 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Harry E. Keller

**Mailing Address:** 2809 PALM AVE  
**City:** MANHATTAN BEACH  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3108021600

**Email Address:** harry@smartscience.net

**Organization:** Smart Science Education Inc.

**Comments:**

We must begin projects such as this one to secure our future. My only concern is for the power sources. Ideally, such projects will use renewable power.

┌  
KEL-1  
└

**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Sunday, June 24, 2018 7:28 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Rebecca Kendall

**Mailing Address:** 2311 Manhattan Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3105450459

**Email Address:** rkendall6@gmail.com

**Organization:**

**Comments:**

I oppose building a desalination plant in the heavily populated area of the South Bay.

┌ KEN-1  
└

**From:** West Basin  
**Sent:** Friday, May 4, 2018 4:14 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Lindsey Kernan

**Mailing Address:** 131 Kelp St.  
**City:** Manhattan beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Lindsey.kernan@hklaw.com

**Organization:**

**Comments:**

My family strongly opposes the project at both proposed sites and vehemently oppose the south site location. The proximity of the south site location to our residential neighborhood is very troubling due to noise and pollution concerns both during and after the 6 year construction period. Also troubling about either location are the known environmental impacts to the ocean and marine life. The increased saline in the south location is particularly troubling given that the public beach access - bringing thousands of surfers and other beach goers daily - is directly next to the south site. Any negative impact on the water quality is very concerning for all of those beach goers including my family.

KER-1  
KER-2



**From:** West Basin  
**Sent:** Thursday, April 12, 2018 2:25 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Aaron Klafter

**Mailing Address:** 228 Seaview Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3102832360

**Email Address:** aaronklafter@gmail.com

**Organization:**

**Comments:**

It is preposterous to even consider building/maintaining a project of this size and scope near a residential community when another site is available. To even consider the southern site verse the northern-most site is completely irresponsible, especially when that proposed site is behind decommissioned smoke stacks verse an entire community of families

| KLA-1

**From:** West Basin  
**Sent:** Tuesday, May 29, 2018 7:24 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Karen Klink

**Mailing Address:** 501 Herondo St. #36  
**City:** Hermosa Beach  
**State:** CA  
**Zip:** 90254

**Telephone # (daytime):** 3103399761

**Email Address:** klinky2@yahoo.com

**Organization:** ms

**Comments:**

I am against the DeSal Plant. It is not appropriate, it uses a lot of energy, costs a lot of money and can destroy sea life. Also the by product is too much salt and chemicals. Thank you!

KLK-1

## Comment Letter KREGER

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/28/2018	Michael Kreger	229 Rosecrans Place	Manhattan Beach	CA	90266	<p>As a resident and homeowner in El Porto, I once again find myself being treated as a second class citizen of Manhattan Beach. Whether it's a proposed skate park, the lack of progress on utility undergrounding, or now a large scale Desal plant, I find my comfort, property value and right to live peacefully being threatened. The proposed location is unacceptable to those in the El Porto community as it negatively impacts our beaches, adds yet another industrial project to the area and ultimately destroys the property value and lifestyle of those closest to the facility. In addition, these projects rarely if ever make economic sense when taking into account the future rising costs of the water - residents end up experiencing rising prices to subsidize the excess capital cost of the project. I implore the decision makers to make the appropriate decision and protect the rights of those most negatively impacted by the project. I am hopeful that progress can be made toward an inclusive Manhattan Beach that values all of its residents equally.</p>

KRE-1

**From:** West Basin  
**Sent:** Friday, April 6, 2018 8:37 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Andrew Lelchuk

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):** 8189547124

**Email Address:** andrew.lelchuk@warnerbros.com

**Organization:**

**Comments:**

The north location is the preferable location - if we are not able to deter or eliminate the need to put a plant anywhere near north Manhattan Beach

LEL-1

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 11:30 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Thomas Libbey

**Mailing Address:** PMB 1027 1122 E Pike St  
**City:** Seattle  
**State:** WA  
**Zip:** 98122

**Telephone # (daytime):** 5555555555

**Email Address:** thoma\_libbey@hotmail.com

**Organization:** Mr

**Comments:**  
I oppose the proposed plant, joining Redondo Beach, Manhattan Beach, Hermosa Beach and Culver City.

LIB-1

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 4:27 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** David Lombard

**Mailing Address:** 116 S Guadalupe Ave Apt A  
**City:** Redondo Beach  
**State:** CA  
**Zip:** 90277

**Telephone # (daytime):** 3106914954

**Email Address:** dl90277@gmail.com

**Organization:**

**Comments:**

I am opposed to the project. Looking long term we should instead focus on conservation through education, subsidies for low water appliances and landscaping and rates that encourage conservation. Additionally, there is still available much treated wastewater discharged from Hyperion into the ocean that can be converted to domestic use.

LOM-1

**From:** Janet London  
**Sent:** Wednesday, March 28, 2018 7:43 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Janet London

**Mailing Address:** 129 42nd Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 9099382450

**Email Address:** janetrlondon@earthlink.net

**Organization:** Resident home owner

**Comments:**

I would like to strongly suggest that if the plant for desalination is to be built that the site furthest from 45th st be used. My husband and I are still reviewing the overall impact of the plant for the area. We do however feel strongly that the plant will impact our property values negatively as well as more importantly our enjoyment of our home now in our retirement. We worked very hard to have this home and wish to now enjoy it.

┌  
└ LON-1

**From:** LaTonya Dean  
**To:** Amy Rocha; West Basin Desal EIR  
**Subject:** FW: Desal EIR  
**Date:** Monday, April 30, 2018 5:50:39 PM

---

Re-sending to the correct Desal EIR address.

Thanks,  
LaTonya

---

**From:** LaTonya Dean  
**Sent:** Monday, April 30, 2018 3:29 PM  
**To:** Amy Rocha; 'desaleir@westbain.org'  
**Subject:** FW: Desal EIR

---

**From:** Scott Houston [mailto:shouston45@hotmail.com]  
**Sent:** Monday, April 30, 2018 3:25 PM  
**To:** Patrick Sheilds  
**Cc:** Steve O'Neill; LaTonya Dean; Julie Frazier-Mathews  
**Subject:** Fw: Desal EIR

---

Hi Patrick,

The e-mail below was sent to me from a member of the El Segundo Environmental Committee with some questions about the EIR if you could please coordinate answers to him. And I'm also sending this as it needs to go in the record as comments received.

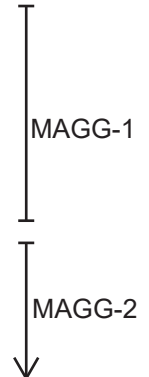
Thanks,

Scott

----- Original Message -----  
Subject: Desal EIR  
From: kevin maggay <[kmaggay@gmail.com](mailto:kmaggay@gmail.com)>  
Date: Mon, April 30, 2018 2:54 pm  
To: [info@scotthouston.org](mailto:info@scotthouston.org)

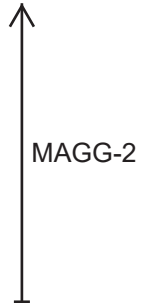
Hey Scott-  
it was good running into you at the ES Environmental Committee booth at the farmers market. i mentioned that i had a couple of concerns about the EIR. my main concerns center around the EIR deferring analysis and determining mitigation, particularly for GHG emissions and Marine biology. These are the two controversial topics for desal plants, so quite frankly i was surprised they were treated this way.

For GHG emissions, the document says that they will calculate the emissions and then mitigate emissions through offsets and things like that to get to carbon neutral. West Bason should be able to forecast emissions rather easily with





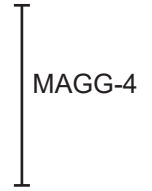
existing information. The PM stated that we wont know the carbon intensity of the grid in the future, but you can use AB/SB 32 requirements to forecast. This will give the public (and West Basin) an idea of what scale mitigation would be needed. What stood out more so was that the EIR states, "West Basin 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, with low-cost options preferred over high-cost options" To me this gives West Basin an out of mitigation is deemed (by West Basin) to be too expensive. It doesn't seem like a very strong commitment to me.



Also for marine biology, there is no study done to determine the scale of mitigation needed. These should be many studies that have calculated the marine life/habitat lost from out/intake operations.



Typical EIRs forecast worst case scenarios, which i dont necessarily agree with because you run the danger of over mitigating, but there is a lot of precedent for it.



Are there any plans to do these studies prior to the adoption of the EIR?



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) DR. KIRAN R. MAGIAWALA

Mailing Address 4015 W 137TH ST APT 107 HAWTHORNE CA 90250  
Street City State Zip

Telephone # (daytime) 310 978 1434

E-mail Address kiran\_magiawala@yahoo.com

Organization/Affiliation PRIVATE CITIZEN

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

SUGGESTION FOR EVALUATING COMPLEMENTARY OPTION  
FOR REDUCING GHG EMISSIONS

WORKING WITH CAL FIRE, USFS AND NATURE CONSERVATION  
(USFWS), COMBINED TO EVALUATE POTENTIAL FOR GHG  
EMISSION MITIGATION BY PLANTING TREES IN  
OUR STATE FORESTS THAT HAVE APPROXIMATELY 130  
TRILLION DEAD TREES AT PRESENT

THANK YOU!

04/25/2018

MAGI-1

To mail: fold, staple or tape together, and include a stamp.

**From:** Peggy Malpee  
**To:** [West Basin Desal EIR](#)  
**Cc:** [Peggy Malpee](#)  
**Subject:** Proposed Water Desalination Plant  
**Date:** Wednesday, April 11, 2018 10:10:13 AM

---

To Whom It May Concern,

I am terribly concerned with your plans for the two proposed locations of this desalination plant. Neither location will suit the needs of fresh water and preserve the integrity of heavily populated beach residences and beloved beaches.

The location at 45th Street is totally unacceptable for all North End residents. It is too close to homes and apartments, and will adversely affect our lives and our property values. We are still unclear as to the noise this plant will create as well as the affect to the integrity of our beaches and salt water.

In addition, the location at the jetty below the NRG is equally bad. It is still too close to a heavily populated beach, El Porto, and to the bike path.

My proposal is this: select a place along the sparsely populated stretch of Dockweiler Beach. There are no residences there and the beach is huge. Although it is somewhat popular during the summer, there is plenty of space for both the desalination plant and beach goers. There are also various parking lots where the construction crews, materials, and machines can be housed without causing traffic jams on Vista del Mar.

PLEASE PLEASE PLEASE - - - reconsider your current plans. There is a way to have both the plant and NOT affect our densely populated community and beach.

Sincerely,  
Peggy Malpee  
Resident of El Porto for 67 years  
Owner of three properties  
My great grandmother built a residence on Moonstone Street in 1934; my parents built their home on 41st Street in 1954; and my home on 41st Street was built in 1946.

MAL-1  
MAL-2

**From:** West Basin  
**Sent:** Friday, April 6, 2018 5:32 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Andrea Marron

**Mailing Address:** 200 38th St.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 5852698592

**Email Address:** andreamarron@gmail.com

**Organization:** Ragtrades

**Comments:**

I object to the south site. I'm a home owner in El Porto and this will clearly affect us in term of visual and audible at the least.

|  
| MARA-1  
|

**From:** West Basin  
**Sent:** Wednesday, April 25, 2018 7:56 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Andrea Marron

**Mailing Address:** 200 38th st.  
**City:** Manhattan beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 5852698592

**Email Address:** andreamarron@gmail.com

**Organization:** Self

**Comments:**

We are opposed to the desalination project and do not want it to be located in or near El Porto Manhattan Beach. We strongly object to the South Site.

┌ MARA2-1  
└

**From:** West Basin  
**Sent:** Thursday, June 21, 2018 6:30 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Joseph Marron

**Mailing Address:** 2311 Manhattan Ave.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Marron.joseph@gmail.com

**Organization:** Self

**Comments:**

I am opposed to this project because of its proximity to highly populated area. It would result in increased truck traffic and occupy land that is of high value to residents. Thank You

┌  
└ MARJ-1

## Comment Letter MASON

**From:** LaTonya Dean  
**To:** [West Basin Desal EIR](#)  
**Cc:** [Amy Rocha](#)  
**Subject:** FW: Desal  
**Date:** Monday, April 30, 2018 5:49:25 PM

---

Hi Amy,  
Resending to the correct Desal EIR address.  
Thanks,  
LaTonya

---

**From:** LaTonya Dean  
**Sent:** Monday, April 30, 2018 5:35 PM  
**To:** Amy Rocha; 'desaleir@westbain.org'  
**Subject:** FW: Desal

Hi Amy,  
Fyi...I will forward a response from Dir. Kwan's e-mail address.  
Thanks,  
LaTonya

**From:** Allan Mason [mailto:silvermason@verizon.net]  
**Sent:** Tuesday, April 24, 2018 12:37 PM  
**To:** LaTonya Dean  
**Subject:** Desal

Dear Carol. I've been following this proposal since it was first made, and have seen nothing to suggest this is more than a huge waste of money. It is the least cost-effective solution I've heard for making more clean water available. Please do not do this!

MAS-1

Allan Mason  
Hermosa Beach

**From:** West Basin  
**Sent:** Tuesday, April 24, 2018 9:18 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** shawn matlosz

**Mailing Address:** 527 w franklin ave  
**City:** el segundo  
**State:**  
**Zip:** 90245

**Telephone # (daytime):** 3103226781

**Email Address:** smatlosz@live.com

**Organization:** concerned neighbor

**Comments:**

too many negative environmental issue. please concider heal the bay's viable options before impacting our persious beach

┌  
MATL-1  
└



## Comment Letter MATTHES

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/30/2018	Ella Matthes	4022 Ocean Drive	Manhattan Beach	CA	90266	This Desalination Project will destroy good sea life to provide water. Is it because the water company will be making money on this project? OMG. The Water Company Managers need to come up with a better plan and placement to keep from destroying our area. An area that would be much better would be on Palos Verdes Drive South area where there is already some water and gas projects going on. I myself really appreciate all that you are doing, lets make the future even better for everyone. Thank You, Ella Matthes

MATT-1

## Comment Letter MCMANIS

Date Submitted	Name	Address	City	State	Zip Code	Comments	
3/28/2018	Craig McManis	222 Sea View Street	Manhattan Beach	CA	90266	Please do not utilize the south site. Putting this facility on top of our homes on the south site. We already have to deal with the refinery, the parking lot, the busy highland, parking restrictions, the last thing we need is added noise, smell, etc.etc.	MCM-1

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 9:47 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Craig McManis

**Mailing Address:** 222 Seaview street  
**City:** Manhattan beach  
**State:** CA  
**Zip:** 90250

**Telephone # (daytime):**

**Email Address:** Cmcmanis1000@gmail.com

**Organization:**

**Comments:**

As a non "expert" in any of the effects of this intrusion I would like to add these comments. El Porto residents already have to contend with the largest west coast refinery, one of top 3 largest airports in the us, Edison's massive power lines, el Porto parking lot, NRGs facility. How can the average resident know the impact of one more disruptive utility. Even at your "open house" event you had 15 scientists and "experts" in multiple disciplines with the unintended bias of being paid by the west basin to tell us this will have no effect. I hope they are right. This long construction period is going to materially impact our lives for up to five years. Noise traffic congestion vibration of large trucks. Effectively 5 years could represent 25% of my remaining life. As long time property owner in MB I have the following suggestions. - build it in the north location and do not use the south location for staging. - "Compensate" for the five year loss of tranquility. A) pay for the utility undergrounding in el Porto. B) beautify highland in El Porto with the addition of trees (Palms are nice) C) plant copious lush Vegetation throughout the south site to obscure the construction site and beautify the area. D) no water bills for el Porto residents for the duration of construction.

|

MCM2-1

**Justin Sumi**

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Monday, June 25, 2018 5:31 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Rachel McPherson

**Mailing Address:** 1421 E. Sycamore Ave.  
**City:** El Segundo  
**State:** CA  
**Zip:** 9024

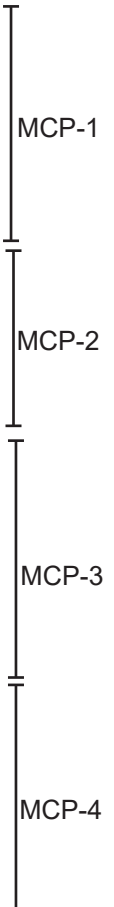
**Telephone # (daytime):** 310-890-8638

**Email Address:** seascuba@sbcglobal.net

**Organization:** NONE

**Comments:**

Ocean water belongs to the public. As such, I have a fundamental issue with a private company removing a public resource and selling it back to the public at the expense of that resource. I believe the right thing to do is petition the State Water Resources Control Board for a permit to allow Indirect Potable Reuse (IPR) and push the timeline for Direct Potable Reuse (DPR). I am against this proposal. I think it will raise rates on end users while not reducing demand for a resource that should be conserved. Which leads me to believe this is completely a for profit enterprise which will come at the expense of resource control, the consumer, and the environment. The water intake design will kill 100% of the zooplankton and phytoplankton that is sucked into the pipes. While it may be sufficient to reduce fish impingement, it is not adequate for the issue of entrainment. I think cleaning of the screens will lead to increased bacteria around the intake system, or periodic bypass of the screens. As a result the reduced velocity and screen systems will fail. Additionally, entrainment impacts have not been adequately studied in this area, and the assertions made in the EIR are not adequate for the minimal Mitigation Measures. Subsurface intake should be assessed. I do not think the EIR adequately describes the impacts of the discharge. SCCWRP studies have shown that negatively buoyant discharges are not diluted by ocean currents in a flat seabed and dilution requirements may not be met. I think detailed plume models should be run with Before-After Control-Impact monitoring with reference locations. I do not think the EIR adequately compares alternatives, because of the fundamental issue that the State of CA does not allow DPR or IPR. While I understand the dilemma, this does not meet a minimum bar of "alternatives"; it is simply an assessment of doing desalination or staying with the status quo of reliance on imported water. Increasing CO2 and energy needs is not a viable solution to our water crisis at this time. Until simple reduction strategies are met-getting rid of water thirsty lawns, allowing or mandating rain barrels, allowing/mandating (for retrofit and new build) in-home gray water re-use, using recycled water for irrigation, doing O&M on the old and failing pipeline infrastructure which regularly wastes water with massive leaks, using capture and re-use devices, implementing green streets, ocean friendly medians, parks and home landscaping-Desalination should remain at the bottom of the totem pole.



**From:** West Basin  
**Sent:** Wednesday, May 2, 2018 6:29 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Arthur Merkin

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** artmerkin@gmail.com

**Organization:**

**Comments:**

I am against the project. I would prefer the water district pursue water recycling efforts over a desalination facility near a residential neighborhood. VERY concerned about noise and traffic. Concerned about noise, pollution from the machinery, so close to our homes! Please do not build so close to residential area, surfers, swimmers, and public beach!

┌  
└ MER-1

**From:** Suzanne Michel  
**To:** [West Basin Desal EIR](#)  
**Subject:** West Basin El Segundo Desalination Plant  
**Date:** Saturday, May 26, 2018 1:03:31 PM

---

**Unnecessary Desalination Plant**

The Manhattan Beach, Hermosa Beach and Redondo Beach City Councils are opposed to the proposed \$600 million West Basin El Segundo desalination plant. Every reputable environmental organization is also opposed. This is due to the adverse impacts from ocean dumping of concentrated toxic brine, air pollution, energy inefficiency, required chemical sanitizing of desalinated water, excessive escalating cost, and disregard of more viable alternatives that will provide a safe and reliable water supply. West Basin is the only local water district currently proposing desalination, while others have rejected desalination. It's time to stop wasting taxpayer and ratepayer money on this unnecessary, ill-conceived project!

MIC-1

Suzanne Michel  
Manhattan Beach

**Justin Sumi**

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Monday, June 25, 2018 1:47 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments  
**Attachments:** DesalComments\_TMZ\_06252018.pdf

Comments - Form from West Basin Desal Site

**Name:** Tracey Miller-Zarneke

**Mailing Address:** 501 Oregon Street  
**City:** El Segundo  
**State:** CA  
**Zip:** 90245

**Telephone # (daytime):** 310-529-0542

**Email Address:** traceymz@socal.rr.com

**Organization:** Resident of El Segundo

**Comments:**

File attached with the same comments in case I have exceeded this space: While I respect West Basin's desire to diversify its portfolio of water sourcing, I have a few concerns with the proposed desalination project as a resident of El Segundo. I believe this project will greatly affect customers of West Basin (myself included) on an economic level due to its construction and operational expenses being passed along, and its construction and operation will also greatly affect residents of El Segundo from an environmental perspective. Having attended several meetings and discussions on this project in the last three years, I believe I have a well-developed understanding and basic facts straight in my head in order to form these thoughts, but I apologize in advance if I have misunderstood any of the materials presented. 1) I am

MILZ-1

concerned that there is only a "high concept plan"

shared on what building pipes from the plant to customers receiving the DPR water would entail, which means there is no sense of impact or expense presented at this point. This opens up the project to a whole other level of City complications, disturbance and expenses. 2) I am wondering why West Basin does not focus its effort on more storm-water capture and increased recycling from Hyperion at this time, which would seem to provide much greater amounts of clean water at a much lower use of energy and lesser expense. I believe the Edward C. Little plant has the capacity to reach 100mgd and is only currently planning to increase to 70mgd (per the newest deal with Hyperion) from its standard 40mgd at this point in time; thinking about the energy used in 1500kph for recycling vs 4000kph for desalination is an astronomical difference. 3) There are numerous construction and operational impacts that are deemed

MILZ-2

"less than significant with mitigation," but there is also mention that if mitigation is decided to be not feasible or affordable, then it may not be undertaken. Thus, such unmitigated impact could no longer be considered "less than significant,"

MILZ-3

which therefore allows significant impact upon the environment from a number of construction and operation factors. Furthermore, I am unclear how the option for "indirect habitat restoration"

MILZ-4

(such as supporting the Ballona Wetland Restoration Project) mitigates damage done directly within the bay. 4) I would like to understand at what threshold of expense or construction complication would the "less-disturbing-to-sea life" subsurface intake not be utilized. This approach to above clay, below sludge intake seems much less risky for the smallest organisms in the ocean environment, and this seems like an important area of mitigation to not "cheap out"

MILZ-5

on. I do appreciate the thoughtful efforts to discharge the brine in a less concentrated and shear stressful way, but have concerns that this will still negatively impact organisms. I will continue to hope that

**Comment Letter MILLER-ZARNEKE**

within a bay that is already hampered by impact from Hyperion output, storm water drainage and numerous other business effects. I hope that processes that are less expensive and less impactful on environmental, economic and feasibility levels will be advanced to better serve the constituents of West Basin with more locally treated water than imported water. I applaud West Basin for trying to educate the public on this important topic and I thank the board for taking into account these public comments as they move forward in consideration of this project. Thank you for your time in receiving and reading my input. Sincerely, Tracey Miller-Zarneke El Segundo Resident traceymz@socal.rr.com 310.529.0542

MILZ-5  
MILZ-6



**From:** [West Basin](#)  
**Sent:** Saturday, April 7, 2018 10:13 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Emmett Miller

**Mailing Address:** 208 38th Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310-951-2741

**Email Address:** milleremmett@hotmail.com

**Organization:**

**Comments:**

To whom it may concern, please be aware that the "south site" option for the plant would be a disaster for our North Manhattan Beach neighborhood. The south site would put the plant literally next door to scores of houses, creating an enormous, noisy eyesore. It would suddenly and irrevocably destroying the peaceful surroundings and atmosphere. Homeowners here have done so much in recent years to beautify and renovate the neighborhood, including a pending plan to bury the power lines. I humbly ask that you recognize the extraordinary disruption that would be caused by putting a desalinization plant right next to this residential zone, and choose instead the "north site". Thank you for your time.

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MILE-1  
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**From:** West Basin  
**Sent:** Friday, May 25, 2018 1:26 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Manuela Millington

**Mailing Address:** 315 Gull Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 31096276303

**Email Address:** m.millington4@gmail.com

**Organization:**

**Comments:**

Hello, I have multiple concerns about the proposed desalination plant. First there are other ways to conserve and capture water. It has been proven that the plants that have been built in the past have not been fully used or have a major cost to build and to the end use consumer. The amount of electricity it takes to generate the facility will create additional toxins and EMFs into the environment. In either locations that are being proposed the impact to traffic to the residents of Manhattan Beach and El Segundo will be unbearable. Being a home owner of two locations one in El Segundo and another in North Manhattan Beach, makes both locations undesirable. That said the most northern location seems a better option based on proximity to swimming beaches and residential impact of noise from the actual plant. The 45th street location would be an absolute travesty. I am opposed to the plant being built altogether. As stated, there are other options for us to attain water without the impact to the environment, neighborhoods and ocean life that this plant will clearly negatively impact. Thank you for your consideration. Manuela Millington

MILM-1  
MILM-2  
MILM-3  
MILM-4



# West Basin Municipal Water District Ocean Water Desalination Project

Comment Letter MITCHELL

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) JANE MITCHELL

Mailing Address 1908 HARKNESS ST M.B. CA 90266  
Street City State Zip

Telephone # (daytime) 310-376-1973

E-mail Address MANBCHDOLPHIN@MSN.COM

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

I AM IN FAVOR OF DESALINATION

MIT-1

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To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

5.b

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Annelisa Moe

Mailing Address 1444 9th st Santa Monica CA 90401  
Street City State Zip

Telephone # (daytime) (310) 451-1500 x139

E-mail Address a.moe@healthebay.org

Organization/Affiliation Heal the Bay

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

Will provide oral comments for item 5.B. | MOE-1

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To mail: fold, staple or tape together, and include a stamp.

Donald Dear (West Basin Board of Director) , Gloria Grey (West Basin Board of Director), Carol Kwan (West Basin Board of Director), Scott Houston (West Basin Board of Director), Patrick Shields (West Basin General Manager), Steve O'neil (West Basin Legal Counsel), Zita Yu (West Basin Staff), Julie Frazier-Matthews (West Basin Staff), Connor Everts (Desal Response Group) , Annelisa Moe (Heal the Bay), Amanda Sackett (Surfrider Foundation),

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Donald: So, I'll call the meeting to order, the special board meeting of West Basin, and, uh, we – now a quorum of four. And, uh, under public content – comment, we have three requests to speak under agenda item 5B. Is anyone else with the public, wants to comment? Okay, we'll go on to presentations, there are none. Item 5A, I think 5B first, so we can move things along, if that's okay with you, and, uh, it was Connor Everts, I believe, is the first speaker.

Connor: Thank you very much. Connor Everts with the Desal Response Group. Um, I just wanted to refer to our, um, letter from our coalition asking for an extension of 30 days until June 25<sup>th</sup>. Um, for the comments, um, you all have, I know, worked very long and hard on putting together a draft EIR. Uh, we were having some problems. Um, one, downloading some of it, and then having access, the items, the [inaudible] [00:01:04], so we're asking for more time on that.

I also wanted to commend your staff. I realized that you weren't here, but for the first public meeting in El Segundo, we had a very large turnout. People wanted to speak and, uh, staff let them do it, and I thought that was a good interchange we had, a little contentious at times, but, uh, we appreciate that. And I also wanted to, um, commend you on your continuing, um, water barrels, uh, rain water workshops, and even the water bottle filling stations, and, uh, I think that helps, uh, us and you to interact with the public. Thank you very much.

Donald: Thank you. Who's next? Do we have who's next?

Julie: Thank you, Director Dear. The next speaker is Annelisa Moe.

Annelisa: Good morning, madam chair and members of the board. Um, I've met a few of you at this point, but I just wanted to introduce myself. My name's Annelisa Moe, uh, and I work with [inaudible] as a water quality scientist. Um, and on behalf of [inaudible] I just wanna reiterate some of, um, Mr. Everts comments that we would like to, um, be able to extend the comment period for the draft EIR, um, and also, commend you guys for the work that you have done. Um, I am new to a lot of this. I got hired about two months ago, but seeing some of the presentations this morning, um, it was, uh, great to see some of the projects that you guys are putting forward, so thank you very much.

MOE-2



# West Basin Municipal Water District Ocean Water Desalination Project

Comment Letter MOIR

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) ELIZABETH MOIR

Mailing Address 3000 HIGHLAND AVE - MANHATTAN BEACH CA 90266  
Street City State Zip

Telephone # (daytime) (310) 545-6121

E-mail Address BMOIR13@GMAIL.COM

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Monday, June 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

- ① I think there are many ways to conserve water before embarking on such an expensive project MOI-1
- ② Since evidently you don't want to consider these, the North site would be my preference instead of the South MOI-2
- ③ Are the grants to pay for this guaranteed & how much? MOI-3
- ④ Very detrimental to property values in El Porto MOI-4
- ⑤ Length of project too long, too disruptive & too expensive not to mention too noisy & dirty MOI-5
- ⑥ I am totally against this project!

To mail: fold, staple or tape together, and include a stamp.

Lynne R. Moore  
333 Continental Boulevard  
El Segundo, CA 90245  
June 12, 2018

Mr. Patrick Shields, General Manager  
Honorable Members of the Board of Directors  
West Basin Municipal Water District  
17140 South Avalon Blvd.  
Carson, CA 90746-1296

Dear Mr. Shields and Directors of the West Basin Board,

Re.: Response to Draft EIR

Like many in the community, I believe that the desalination plant is not needed due to the success of conservation. The six hundred million dollar cost is exorbitant. Less money could be spent to expand the recycled water plant to maximum capacity of one hundred million gallons of water per day—which would help our community and improve our environment, and thus our health and that of our children and grandchildren.

MOO-1

Appallingly, the desalinization plant would distribute thick, murky brine into the Santa Monica Bay, which would settle on the ocean floor. That would have a seriously detrimental, if not lethal effect on marine life. Apparently, large solids would also have to be removed from the plant on a daily or more frequent basis. That would have a detrimental effect on already congested area traffic and—worse yet—require large trucks that would pollute the air and add to the carbon footprint of the desalinization plant. I’ve already been diagnosed with mild asthma and many other people, especially children, have even worse diagnoses due to air and water pollution.

MOO-2

Were the negative effects on local residents’ health considered by the West Basin Board? What specifically was considered and what decisions were made as a result? What is the basis for West Basin Board decisions? What actions were taken or planned to protect the health of residents, those working in the area, wildlife, and marine life?

MOO-3

I have reviewed the Draft EIR for the proposed desalination plant on the El Segundo coast. I found the DEIR remarkably uninformative as the applicable laws, regulations, and requirements are presented without specific explanations of how West Basin will address and comply with them.

MOO-4

The DEIR raises many concerns about the proposal. Below are some of my questions and concerns about the Process, Finances, and Environmental Analysis:

MOO-5

**Process and Financial Considerations**

- 1) Who gets to vote and decide whether to construct this desalination plant?
- 2) If only the West Basin Board gets to vote, why not submit this to a vote of all residents in the West Basin service area? Otherwise, isn't it taxation without representation?
- 3) Where were the WB Board members during the last public meeting in April?
- 4) Exactly how much will the 20 MGD plant cost to build and how long will it take?
- 5) Exactly how much will the 60 MGD plant cost to build and how long will it take?
- 6) How much money has West Basin spent to plan this project?
- 7) How much money has West Basin set aside to build this project?
- 8) Will West Basin be proposing a bond to be paid from our property taxes to fund all or part of this proposed project?
- 9) In addition, especially given our already high rates, will West Basin and our local water districts be raising water rates for individuals and businesses?

MOO-6

**From Section 5. Environmental Analysis:**

**5.1. Aesthetics**

How can a 4-story plant with multiple buildings qualify for scenic coastal highways and meet the expectations of El Segundo and Manhattan Beach?

MOO-7

**5.2. Air Quality**

With the expectation of over 100 trucks per day along with crew vehicles, does the proposal include the requirement for no emission trucks and vehicles?

MOO-8

**5.3. Biological Resources – Terrestrial**

Why does the DEIR describe environmental laws and regulations without a serious explanation indicating how West Basin will comply?

MOO-9

**5.4. Cultural Resources**

What evidence can you provide that the project was developed in consultation with the State Historic Preservation Officer, Native American tribes, local governments, and other interested parties? Can you provide a list of dates of meetings, including with El Segundo and Manhattan Beach, along with a list of the attendees?

MOO-10

**5.5. Energy**

Regarding energy used for the construction and by the proposed plan, why doesn't the DEIR address the use of solar, wind, and wave energy generation?

MOO-11

**5.6. Geology**

a. Considering the proposed location, which is adjacent to the Inglewood-Newport Earthquake Fault and would thereby be impacted by a tsunami resulting from a serious

MOO-12



earthquake around the Pacific, what strategies will be implemented and established to prevent the hazardous chemicals from leaking into Santa Monica Bay?

↑  
MOO-12

b. What will be done to mitigate the ground pollution caused by the Chevron oil tanks?

**5.7. Green House Gas**

How has the goal of increasing renewable energy use been addressed?

MOO-13

**5.9. Hydrology and Water Quality**

How can you prove that the proposed desalinization plant in El Segundo will meet the requirements of the California Ocean Plan? The DEIR describes the requirements of the California Ocean Plan—but not how West Basin will meet those requirements.

MOO-14

**5.10 Land Use**

Why would West Basin propose this location along the coastline next to a residential area an in a congested traffic area?

MOO-15

**5.11. Marine Biological Resources**

Why does your list of “Sources Cited” not include the scientific studies on the negative impact of desalination on the Bay of Oman?

MOO-16

**5.12. Noise**

While the DEIR addresses the City of El Segundo, the proposed plant is immediately adjacent to North Manhattan Beach. The DEIR does not describe any attempt to respond to the requirements of the City of Manhattan Beach. Why?

MOO-17

**5.14. Recreation**

How can this proposed commercial development along the coast meet the objective of the Coastal Commission to “protect coastal access?”

MOO-18

**5.16. Utilities**

The DEIR indicates that there are unenforceable standards for drinking water. Drinking water may contain contaminants that cause skin or tooth discoloration or impact taste, odor, or color. The DEIR does not indicate whether the desalinization plant will include contaminants that will impact people in such ways.

MOO-19

Thank you for your consideration of my concerns. Many of us in the community are watching and we look forward to your response to all of our questions in a public format, such as in the Los Angeles Times, a community-wide mailing, or public meeting.

MOO-20

Sincerely,

Lynne R. Moore

**Comment Letter MURILLOE**

Date Submitted	Name	Address	City	State	Zip Code	Comments	
3/28/2018	Esteban Murillo	205 Gull Street	Manhattan Beach	CA	90266	I am dead set against the desal plant going up at the bottom of 45th Street. The economic impact of putting the plant there will amount to literally millions of dollars in lost value of homes in that area.	MURE-1



# West Basin Municipal Water District Ocean Water Desalination Project

Comment Letter MURILLO

**Comment Card**

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Steve Murillo

Mailing Address 205 Gull St, Manhattan Beach, CA 90266  
Street City State Zip

Telephone # (daytime) (310) 266-4154

E-mail Address Steve 90266@gmail.com

Organization/Affiliation Property Owner

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

Before a desal plant is considered as a solution, a cost trade analysis should be performed, looking at increasing recycling imported water at the Hyperion Treatment plant. Presently, Hyperion is at approx 20% capacity. Increasing recycling capacity to only 40% would satisfy projected needs and will be FAR LESS EXPENSIVE

MURS-1

To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Steve Murillo

Mailing Address 205 Gull St, Manhattan Beach, CA 90266  
Street City State Zip

Telephone # (daytime) (310) 266-4154

E-mail Address Steve90266@gmail.com

Organization/Affiliation Property Owner

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

Placing the proposed desal plant at the bottom of 45<sup>th</sup> St, MB (South Site) will SIGNIFICANTLY impact the quality of life for people who live in North Manhattan Beach! I am STRONGLY OPPOSED TO THE SOUTH SITE! If the desal plant is placed here, WBWD should be prepared for a multimillion dollar legal battle for the millions in lost property values.

MURS2-1

To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Steve Murillo

Mailing Address 205 Gull St, Manhattan Beach, CA 90266  
Street City State Zip

Telephone # (daytime) (310) 266-4154

E-mail Address Steve90266@gmail.com

Organization/Affiliation Property Owner

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

How is it possible for Carol Kwan, our Board representative, to render an unbiased vote on the proposed Desal plant when she sits on another Board PROMOTING Desal?! CAL DESAL PROMOTION BOARD  
 CONFLICT OF INTEREST!

MURS3-1

To mail: fold, staple or tape together, and include a stamp.

**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Sunday, June 24, 2018 6:26 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Michelle Murphy and Bob Perkins

**Mailing Address:** 4420 The Strand  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3105456751

**Email Address:** murphyperkins@gmail.com

**Organization:**

**Comments:**

We preface our comments on the Draft Environmental Impact Report (“Draft EIR”) by saying we oppose the proposed desalination project. Nearly 20 years ago during meetings and hearings about building new generators at the El Segundo Power Plant, West Basin officials approached us and other home owners near the site and told us they wanted to build a desal plant either here or in Redondo. There was no drought at the time and the officials didn’t claim the new plant would solve any existing water issues. They described it as being a small almost demonstration sized plant that was needed so we could learn more about desal. We believe that is still the case. This plant isn’t needed and is wanted by those in the industry (so much wanted that they have spent more than \$60 million pushing for it with nothing to show for it as yet) because it is a profitable huge corporate solution to a problem that doesn’t exist. We already are learning what we need to know about desal from plants being built where they are needed in desert areas like Saudi Arabia and Israel. When and if we do need to implement desal we can do it at that time with state of the art technology that has been tried and tested in places where it was necessary instead of in the South Bay where we will pay with degraded air and water and also wasted rate payer money. There is room to debate amounts, but everyone including the authors of the Draft EIR agrees the proposed plant will damage marine life, pollute the local air, cause carbon emissions which will contribute to global warming, and add to the visual and noise pollution of one of California’s premier beaches. We encourage our Water District to take the environmentally sound course. As the Draft EIR says (Section 7.4 Environmentally Superior Alternative): The No Project Alternative is environmentally superior to the proposed Project. West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site, among Project site alternatives evaluated throughout this section.

(emphasis added). There is only one environmentally sound and moral choice for West Basin: no project. And if for whatever reason you choose to build it anyway, use the North Site, not the South. That said, we turn to the Draft EIR. It is deficient in several regards. NOISE: The Draft EIR does not properly address the damage which will be done by noise from construction and operation of the proposed plant, particularly damage to residents, including us, whose 45th Street homes directly face the facility. Section 5.12 does acknowledge that [t]he effects of noise on humans can range from permanent hearing loss to speech interference and sleep deprivation. Prolonged stress, regardless



of the cause, is known to contribute to a variety of health disorders. It also acknowledges that Manhattan Beach’s noise ordinances apply, and that measurements apparently taken by the preparers show existing noise along 45th Street (59.3 db Leq) already exceed the legal limit (50 db at night, 55 db in the daytime), meaning no increase in noise should be allowed. However, the referenced Draft EIR measurements are minimal, misleading, and underestimate the potential problem. They were taken at the corner of 45th Street and the Strand, at street level, not from any of the impacted residences, all of which are above the Strand and therefore, in varying degrees, above the berm which shields the Strand itself from noise the power plant and proposed desalination plant make. A proper EIR would include longer measurements, over a representative sample of times, taken from the upstairs of houses along 45th Street and including the middle of the night, when the ordinances are more restrictive and, because ambient noise is less, the impact of the plant on residents will be greater. Regulators required the existing power plant to take such measurements; some of them were taken from our house, which we will make available for your instruments, too. Second, the proposed mitigation during construction is inadequate; as the Draft EIR itself admits, 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 would be exceeded for an extended duration. The Draft EIR correctly concludes that despite proposed “mitigation” the damage is considered significant and unavoidable. (emphasis added). The EIR should propose mitigation e.g. furnishing sound insulation for affected residences--new windows and whatever other technology exists to mitigate obnoxious noises--and/or abandoning the proposed southern site, which is much closer to residences) which avoids significant damage. We remember our irritation during the building of the new power plant generators caused by construction vehicles back up warning signals which are designed to be noisy, disruptive and fingernails-on blackboard painful. Operational noise, which will continue for the life of the project, is worse, and the Draft EIR is, to state it kindly, less than forthcoming about the operational noise effects. It starts by admitting that the Southern site’s Operational noise (assuming 100 dBA at the noise source) would be approximately 62dB which could (sic) exceed Manhattan Beach’s operational noise standards for residential uses. Could exceed? Does vastly exceed the maximum noise level at those units is, during sleep times, 50 db from all sources, not 62 db from the desal plant. And that is where the Draft EIR is less than candid. It proposes “mitigation” which would, it is asserted, achieve 40 dBA attenuation, presumably at the noise source. But it does not say what the predicted noise level at the residences would be. Noises are additive, though not linearly, and because 45th Street noise is already at the limit, the question which must be asked, the question which this Draft EIR dodges, is whether operation of the plant will increase ambient noise at any residence in Manhattan Beach. If it will, it is against the law to operate the plant. And the Draft EIR is deficient in not saying that. There may be two reasons the Draft EIR doesn’t address that either the drafters are deliberately avoiding the question, or (more likely) they don’t have the data to address it, because they don’t even know what the current noise level is at the residences (as opposed to at the Strand). Either way, they should be forced to take those measurements, make those calculations, and then, if the project is approved and constructed, take as-built measurements proving there is no increase in ambient noise at 45thStreet residences. It’s neither unfair nor too difficult in fact, that is exactly what the operators of the El Segundo power plant had to do to obtain their permit. Until the before measurements are taken and the calculations made, this EIR is defective. VISUAL The proposed desal plant will severely impact some of California’s most glorious public and private views of beach, surf and ocean. The Draft EIR acknowledges that, as stated in Coastal Act Section 30251, a primary objective of the CCC is to protect the scenic and visual character of the California coast, and accepts that existing public scenic views and vistas of the Pacific Ocean are present in the Project area. However, it encourages the Water District to deface the beauty your constituents currently enjoy on the pretext that Vista Del Mar and 45th Streets (which bound the property where the desal plant is to be built) are not designated California Scenic Highways, That’s not the issue. Designated or not, these roads both have gorgeous ocean views, as do



Manhattan Beach State Park, the bike path, the Strand walkway, and homes along 45th Street and farther south. All will be impacted. Concerning the private properties whose views would see sand, see and sky replaced by a huge building, the Water District should defer to its member city Manhattan Beach, whose General Plan has Goal LU-5: Protect residential neighborhoods from the intrusion of inappropriate and incompatible uses. During construction, the Draft EIR says, The existing 45th Street berm would be retained and re-landscaped to minimize exposure to local land uses and public views. It's not clear what the authors intend, but that berm cannot be changed without shutting down the existing power plant, because its current shape is a condition of the permit for that power plant. After construction and for the many decades of planned operation, the desal plant and associated structures would be a blight on the ocean views from Vista Del Mar, 45th Street, the parking lot below 45th Street, the beach, the bike path and the Strand. As the Draft EIR says,

MUP-9

Once constructed, the facility would be visible from the neighboring areas including from the beach areas and from the Marvin Braude Coastal Bike Trail, and from motorists and pedestrians on 45th Street, although 45th Street is not equipped with sidewalks. The plant would not just be visible, it and its associated structures would tower over existing structures and partially block views of the ocean. The Draft EIR says the proposed facility will have roof elevations 85 feet above msl. They'll block or blight public and private ocean views (which, after all, are the visual glory of this area not the ability to see the parking lot) for 45th Street, the south end of Vista Del Mar, and The Strand (a public pedestrian walkway which, it should be noted, is not addressed in the Draft EIR). The bike path and the beach to the west of it will see this huge structure looming over them. The Draft EIR makes the specious point that, though the proposed construction will be 85 feet above sea level, that won't matter because there's an existing tank on the property that's 100 feet above sea level. Such gall! That tank is on the eastern, landward part of the tract, more or less tucked into the sand dune. Yes, that tank is an existing imperfection in the beautiful view from Vista Del Mar, but it blocks little of the ocean and beach. The proposed new facility, is to be on the western, ocean side. It -- especially if placed on the southwestern corner of the tract (the "Southern Site") as proposed -- will block and blight far more views, far more severely. The Draft EIR proposes with roof elevations of 85 feet above msl, and will resemble a typical warehouse or light industrial structure. Further visual blight in the form of "Ancillary facilities and large-diameter pipelines connecting on-site buildings would be visible from off-site. In addition, electrical power lines and a substation, not to mention perimeter walls, are planned. Yet the Draft EIR asserts that the impact on the visual character of the area is less than significant with the proposed and wholly inadequate mitigation. Reasonable mitigation is available. If the facility is built at the North Site, though it would remain an ugly scar on views from Vista Del Mar, the bike path and the (lesser used) beach due west of it, it would move it nearly half a mile from other impacted views. That would greatly reduce the impact on Manhattan Beach State Park, the Strand, the parking lot between them, and the public and private views from 45th Street. The Water District should, as a first step in mitigating any proposed desal plant on the El Segundo tract, commit to NOT placing it in the lap of Manhattan Beach beachgoers, tourists and residents, but building it, if at all, on the North Site. Others are better able to talk in detail about the environmental harms that the proposed plant will bring. We only remind you that it will use an outdated technology for water intake that can no longer be used for power plants. That old and damaging technology will kill life at the bottom of the food chain in the ocean. No fish or dolphins will die directly but some of the source of the food that the fish and the dolphins eat to survive will be destroyed. We live on the corner of Manhattan Beach, the Pacific Ocean and El Segundo. Our arguments against the project could be dismissed as NIMBY, but everyone in Los Angeles if not the entire earth ought to consider the Pacific to be the backyard of us all. The only way this project can be approved is if the ocean's health is considered to be inconsequential as compared to the need for this particular plant to desalinate water. Please weight these two priorities carefully.

MUP-10

MUP-11

MUP-12

MUP-13



**From:** West Basin  
**Sent:** Thursday, June 21, 2018 6:08 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Frank Myers

**Mailing Address:** 617 35TH ST  
**City:** MANHATTAN BEACH  
**State:** CA  
**Zip:** 90266-3427

**Telephone # (daytime):** 8478499138

**Email Address:** mfrankmyers@gmail.com

**Organization:**

**Comments:**

I would like to vote my opposition to the project in general and in particular the proposed location at 45th street. This location is too close to the el porto residential community, and one of the few beach parking lots in our city. This location will decrease the beauty and enjoyment residents and visitors derive from the beach.

MYE-1

**From:** West Basin  
**To:** [Noemi Luna](#)  
**Subject:** West Basin Desal Site Comments  
**Date:** Monday, June 25, 2018 5:00:52 PM  
**Attachments:** [Comment Letter.docx](#)

---

Comments - Form from West Basin Desal Site

**Name:** Jan Neal

**Mailing Address:**

**City:** El Segundo

**State:** CA

**Zip:** 90245

**Telephone # (daytime):**

**Email Address:** jnbmom43@aol.com

**Organization:**

**Comments:**

Attached.

Comment Letter

- |  |               |
|--|---------------|
| <p>1. The program will be financed through the State Revolving Fund. Does that mean we can expect prices for water to remain relatively stable? My concern is with the possibility of bumping customer prices to help finance this project. I'm also concerned with availability for funding using anything the USEPA grants due to federal "issues" with environmental and scientific matters.</p>                                    | <p>NEA-1</p>  |
| <p>2. While I appreciate the idea behind using existing pipelines to keep costs down, I am concerned with the long-term viability of the pipes. I don't want them to corrode or rupture 5 years down the line and spent lots to fix them rather than have them done correctly/properly in the first place.</p>   | <p>NEA-2</p>  |
| <p>3. In the Aesthetics section, it seems much of the solutions stem from screening the equipment, so people don't see it. I personally would rather see equipment with the beach in the background rather than have the whole view blocked completely.</p>  | <p>NEA-3</p>  |
| <p>4. I do not believe the current plan does enough to alleviate traffic along Vista del Mar. It is a busy street, and having large construction trucks/equipment will make commutes through that area (there really aren't alternative streets near there... people will just be stuck for quite a ways) <i>substantially</i> longer.</p>   | <p>NEA-4</p>  |
| <p>5. I want to verify that there will be no impacts to air quality from the operational standpoint of the plant. The EIR only lists impacts for construction, not operation. Being so close to the airport, there is already a high amount of air pollution.</p>  | <p>NEA-5</p>  |
| <p>6. Similarly, what about effects on wildlife after construction? It seems the focus is on the building period, and once it's there, there aren't any more adverse effects investigated. No mitigation required after construction seems highly suspicious for anyone who is concerned with nesting animals, marine animals, and all other wildlife in the area.</p>   | <p>NEA-6</p>  |
| <p>7. Desal is <i>highly</i> energy intensive, but no effects to any conservation plans were stated. In addition, the increased usage of energy during the construction phase was also ignored.</p>  | <p>NEA-7</p>  |
| <p>8. In the geology and soils section, I find it highly unlikely that there are no significant impacts. No grading of topsoil to build the facility? No adverse impacts to fault lines due to the potential deep drilling of pile-ons into the ocean floor? This is very doubtful, especially when you read several pages down in the Hazards section where it specifies there are procedures for excavating soil.</p>                | <p>NEA-8</p>  |
| <p>9. In the GHG section, it says how committed West Basin is to constructing and operating a project that reduces energy demand and uses renewable energy but only a. and b. are mandated, and it is not specified how this will reduce energy. I think it falls short of any real, actionable energy reductions. And I would like to see some kind of a preliminary GHG report <i>before</i> proceeding with the project at all.</p> | <p>NEA-9</p>  |
| <p>10. In the hydrology section, I want clarification as to why the brine permeate discharge is disregarded. I think there would be substantial effects with that much brine in one place.</p>   | <p>NEA-10</p> |
| <p>11. In Marine bio, it mentions a study on entrainment on the intake and discharge. Again, I am uncomfortable proceeding with a project before we have all this information.</p>   | <p>NEA-11</p> |

- 12. In the traffic section, it says there will be a Control Plan that addresses the numerous issues, but it doesn't specify if there will be public involvement in this or not. I'm sure nearby residents would like to be included. Additionally, it reports there are no increases to safety hazards. I strongly object to this. With all the construction going on in such a busy area, with high speeds, I find it difficult to believe that there will be no safety impacts. Where there is more traffic, there are more accidents. NEA-12
- 13. Although there are no pathways to DPR yet, I suspect there will be within the next 5 or so years, so asserting this in the EIR is a little misleading because this project would likely not be operational for a long period as well. NEA-13
- 14. The incorporation by reference section lists desal as a key component of water reliability in the UWMP, but because it was also written for West Basin I think it's inappropriate to list it as a source for why desal is necessary. NEA-14
- 15. Figure 2-1 is difficult to read due to monochromatic color choices. NEA-15
- 16. On page 2-29 about halfway down the page, it seems to imply that desal is a step towards direct potable reuse. I don't think this is factually accurate, and I think the phrasing is misleading (it makes it sound as though West Basin is doing this to push direct potable forward and plans to implement that as soon as feasible). NEA-16
- 17. I'm concerned with the pilot project and demo facility. I'd like to see some results/operational notes from both of those. The EIR just lists them as proof with some without stating how well they worked, what issues arose, technology failures, etc. This information should be put forward to the public if you expect people to accept both cases as proof of workability. NEA-17
- 18. The same comment applies to the Algal Bloom/Marine Biotoxin study. The report was "successful" but it doesn't specify how or give any supporting data. It also was from 2009, and I suspect some water quality information has changed since then. NEA-18
- 19. For the intake biofouling/corrosion study, I find the fact that 2 of the 5 samples were lost indicative of a lack of conclusions. It seems to state with certainty what is best, but using 3 of 5 hardly seems conclusive. NEA-19
- 20. It seems that the primary reason for using screen intakes is financial, and I want to be very clear on that. Environmentally, sub surface is better. NEA-20

Much of this EIR seems to have a To Be Determined aspect, and I just want to object to any decision that precludes having all the relevant information. The impact assessments should be pinned down at this point, and the EIR should relate that information to the public. NEA-21

While I appreciate the desire to diversify the water portfolio, I do not think it's prudent to spend large amounts of money to build a plant that will use large amounts of energy for water production. I think the effort could be better spent modernizing the existing water recycling facilities and maximizing the capacity for them.

**From:** Sean Neel  
**Sent:** Wednesday, March 28, 2018 6:45 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Sean Neel

**Mailing Address:** 226 Shell St.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 410-646-0130

**Email Address:** Shellstloc@mac.com

**Organization:** None

**Comments:**  
I strongly oppose this plant, especially the South Plant. I live and enjoy the beach which is right next to the planned site for the South Plant. Please consider the impact that this will have on our quiet neighborhood. Thank you.

NEE-1

**From:** West Basin  
**Sent:** Tuesday, May 8, 2018 12:50 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Ten Nelson

**Mailing Address:**

**City:** REDONDO BEACH

**State:** CA

**Zip:** 90277

**Telephone # (daytime):**

**Email Address:** tennyson.nelson@gmail.com

**Organization:**

**Comments:**

The increase in electricity use is large and significant and must be mitigated. With specific regard to the electricity consumption, the DEIR misrepresents the significance of the increase in electricity use. The appropriate state planning metric is the state approved mid-demand (BASE) SCE sales forecast from the 2017 CEC IEPR, contained in Row 44 of <https://efiling.energy.ca.gov/GetDocument.aspx?tn=222471>. It is NOT the high-demand case as used, since the high-demand case is not the base planning case of the CEC, the utilities or the CAISO. As a result, West Basin misstates SCE's sales as 124,287 GWh in 2027, when they are in fact 96,409 GWH. West Basin errs by selecting the high-demand to mask West Basin's high energy use for desalination. Furthermore, when using the appropriate data as cited above, SCE's electricity sales DECLINE over the period from 2018 to 2027, from 98,304 GWH to 96,409 GWH, or approximately a 2% decline in electricity use. It is clear that the INCREASE in electricity use proposed by West Basin is SIGNIFICANT, as overall electricity use and GHG are declining. In order for this project to be less than significant, West Basin will need to increase its self generation with renewable power, or reduce its overall electricity use with energy efficiency to make this a ZERO NET ENERGY project. Any other action is SIGNIFICANT and must be fully mitigated.

NEL-1

**From:** West Basin  
**Sent:** Saturday, April 7, 2018 8:16 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Phoebe

**Mailing Address:**

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** phoebe.nolan@me.com

**Organization:**

**Comments:**

No desal! No desal please. If it has to go in, it needs to be on the north site, not the south site. No reason to have it on the south site near 45 st. } NOL-1

**From:** West Basin  
**Sent:** Wednesday, April 25, 2018 1:06 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** William Robert Norrie

**Mailing Address:** P.O. Box 220  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** norriegrup@hotmail.com

**Organization:** Citizen of Manhattan Beach

**Comments:**

I am strongly opposed to the proposed south site for the desalination project on grounds of both cost and environmental impact. There are clearly other measures such as rain water capture which should be tried first.

NOR-1



**From:** Kelly Oram  
**To:** [West Basin Desal EIR](#)  
**Subject:** Re: Ocean Water Desalination Public Meeting #1 This Week  
**Date:** Tuesday, April 24, 2018 1:25:17 PM

---

This is unbelievable!!! Please move this huge facility to an area not populated!!

ORA-1

Sent from my iPhone

Sent from my iPhone  
On Apr 23, 2018, at 12:45 PM, West Basin Municipal Water District <[desaleir@westbasin.org](mailto:desaleir@westbasin.org)> wrote:

**From:** Evan Ortega  
**To:** [West Basin Desal EIR](#)  
**Subject:** move forward with desalinization  
**Date:** Wednesday, April 25, 2018 10:06:56 PM

---

Please move forward with desalinization plant. We need more water!  
Evan Ortega  
Manhattan Beach, CA

ORT-1

**From:** Jerry Pancake  
**To:** [West Basin Desal EIR](#); [Jerry Pancake](#)  
**Subject:** Desalination  
**Date:** Friday, April 06, 2018 9:24:18 PM

---

To: West Basin Municipal Water District  
Re: Proposed Desalination Plant

Desalination is not the right direction for West Basin at this time.

Desalination is a very expensive proposition that should be reserved for very special needs and West Basin in nowhere near that territory. The price per acre-foot of desalination water far exceeds the cost of other alternatives by an order of magnitude or more and that is before evaluating the environmental costs.

PAN-1

To help secure our water future we should be prioritizing conservation, recycling, and storm water recapture and others such programs. These alternatives are far more effective, affordable, sustainable, and have much better historic track records for efficacy.

PAN-2

Building a desalination plant is a boondoggle that would be a misuse of public funds and an abuse public trust. Please prioritize the alternatives.

PAN-3

Respectfully,  
Jerry Pancake  
Manhattan Beach

[jerry.pancake@yahoo.com](mailto:jerry.pancake@yahoo.com)

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**From:** West Basin  
**Sent:** Wednesday, April 25, 2018 9:14 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Jerry Pancake

**Mailing Address:** 1136 8th St  
**City:** MANHATTAN BEACH  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3103768243

**Email Address:** jerry.pancake@yahoo.com

**Organization:** MB Residents Assoc, Surfrider Foundation, Sierra Club, Citizens United

**Comments:**

To: West Basin Municipal Water District Re: Proposed Desalination Plant  
Desalination is not the right direction for West Basin at this time. Possibly in the future, but not now. Desalination is a very expensive proposition that should be reserved for very special needs and West Basin in nowhere near that territory. The price per acre-foot of desalination water far exceeds the cost of other alternatives by an order of magnitude or more and that is before evaluating the environmental costs. To help secure our water future we should be prioritizing conservation, recycling, and storm water recapture and others such programs. These alternatives are far more effective, affordable, sustainable, and have much better historic track records for efficacy. Building a desalination plant is a boondoggle that would be a misuse of public funds and an abuse public trust. Please prioritize the alternatives.

Respectfully, Jerry Pancake Manhattan Beach jerry.pancake@yahoo.com >  
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┌  
PAN2-1  
└  
PAN2-2  
└

**From:** Noemi Luna  
**Sent:** Wednesday, May 16, 2018 7:06 AM  
**To:** Justin Sumi  
**Subject:** Fwd: West Basin Desal Site Comments

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**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Noemi Luna

Project Manager

MBI / 626-967-1510

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Tuesday, May 15, 2018 3:43:35 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Kathleen Parker

**Mailing Address:** 316 45th Street

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):** 310-535-9000

**Email Address:** kparker@nimancpa.com

**Organization:** None

**Comments:**

I am opposed to a desal plant because of their questionable benefits, but if it must be built, please choose the further north location where there are already existing smokestacks/industrial area. Thank you for your consideration.

PAR-1

**From:** West Basin  
**To:** [Noemi Luna](#)  
**Subject:** West Basin Desal Site Comments  
**Date:** Thursday, April 26, 2018 3:15:40 PM

---

Comments - Form from West Basin Desal Site

**Name:** Cindy Perelson

**Mailing Address:** 629 31st Street

**City:** Manhattan Beach

**State:** CA

**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** cindyperelson@gmail.com

**Organization:**

**Comments:**

I am strongly opposed to this being built on the south site.

PER-1

**From:** Andrew Phelps  
**Sent:** Tuesday, March 27, 2018 10:03 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Andrew Phelps

**Mailing Address:** 317 Gull St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3104252079

**Email Address:** acp1@me.com

**Organization:**

**Comments:**

We will not accept the South Site proposal for the desalination plant. Not exactly happy about the Northern site either to be honest.

┌  
PHE-1  
└



**From:** Andrew Phelps  
**To:** [West Basin Desal EIR](#)  
**Subject:** Ocean Water Desalination - El Segundo  
**Date:** Monday, June 25, 2018 4:37:22 PM

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To whom it may concern,

I have already made some comments stating my disapproval to this project, due to the environmental and community impact this will have on El Segundo, Manhattan Beach, and the surrounding communities.

However, one of our community neighbors - Colleen Young has put forward a far more eloquent argument against this than I can.

Hence I would like to copy Colleen's comments below and agree with them 100%.

As a community we will be mobilized to ensure we maintain the unique environment that surrounds us. We wish to continue to live in tandem with that environment, and not to destroy it.

Please consider our voices seriously.

Andrew and Elena Phelps  
317 Gull St  
Manhattan Beach  
CA 90266  
310-425-2079  
[Acp1@me.com](mailto:Acp1@me.com)

Email - Colleen Young - 6.25.2018

Please take the time to read and consider all of my input and all of the comments you have received, as you are making a decision that greatly affects a lot of residents and communities in this projects path.

The draft environmental impact report that has been produced is pretty clear, so here is a reminder if you need it at all. Your own report says the following:

Anticipate significant environmental effects, direct, indirect, and cumulative environmental impacts of this project will occur in the following environmental areas: air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, transportation and traffic, noise, aesthetics, light and glare, terrestrial biological resources, marine biological resources, public services, utilities and service systems, recreation, land use and planning, cultural resources. Mitigation measures are necessary to minimize significant impact to hopefully lesser significant levels (where feasible (?), and who knows what where feasible is supposed to mean, possibly when cost effective?). The EIR concludes that there will be significant and unavoidable impacts related to air emissions during construction and increased noise during pile driving associated with the construction.

Also, CEQA requires this NOA to specify if the project site contains any listed toxic

PHE2-1

sites. The project site is identified on the “Cortese List” as having potential for soil and groundwater contamination at the site from past uses on site and neighboring sites (well, there is ground contamination at both these sites, this is already known).

Do we really need to say more than this to oppose such a project with so little accomplishment to the initial water problem? Yes? Well okay then, here it is:

This desalination project does not meet your own laid out objectives to warrant this cost, destruction and harm to the area, communities, and the environment.

### Significant Community Impact

Making a decision to place another environmentally damaging facility in a location just because there are numerous industrial type plants already existing and neighboring nearby in that area is nothing but ignorant to the communities who live and work here, if not an idiotic way as a means of making a decision.

The 2 sites being looked at in this area are not 2 sites, but rather the same site (possibly 1500-2000 feet apart), with all of the same concerns and problems. There is no difference between one location and the other to our communities, and it should not be looked at in any other way.

The disruption to our existing Manhattan Beach, El Segundo, and multiple other surrounding communities during and forever after with regard to our quality of life, noise, air, and ocean pollution is unforgiveable to place an unnecessary and overly expensive way of providing water to west basin ratepayers.

There will be significant impact to our communities during construction onshore and offshore.

Per your consultants there will be at peak construction time 100-110 trucks per day going in and out moving soil and using the roads and affecting traffic, noise, and air quality. Construction will probably take a minimum of 5 plus years to complete, and then the facility may possibly be expanded in the future, which would mean additional construction and ongoing disruption to the communities.

Our communities will be exposed to the contaminated soil being moved by the wind, and by traveling through the neighborhoods. There is no way to mitigate this dust or exposing soil contamination with prevailing winds off of the ocean on a regular and daily basis. Virtually impossible to mitigate this soil contamination from becoming airborne and affecting the residents in surrounding and many other communities that it will travel through.

This construction will also impose an economic impact on our community as people choose to relocate due to traffic disruption, and decide not travel to the cities to avoid the complications of traffic, noise, and the aesthetically displeasing construction.

The ongoing facility usage will have a negative impact on close by communities with regard to ambient noise levels, light and glare, and the aesthetics and views to our surrounding areas.

For some of us here, the increasing creeping and imposing industrial facilities surrounding us that are ever coming closer and narrowing our buffer zone, will definitely affect our property values and most of all our quality of life in our communities.

PHE2-1

### Energy Inefficiency

Seawater desalination is the most expensive and intensive energy consuming way of getting useable water, while completely ignoring the other less expensive and less intrusive ways of providing the water needed. This would be counter-productive to Californians way of life to save energy and preserve our natural environments and ocean. This energy intensive facility will also create additional global warming concerns for the area. You must practice what you preach, not only when it suits your needs and finances.

Currently natural water runs by the billions of gallons out and into the ocean every time we get the rain in the winter months and is ignored, instead of looking at capturing the natural rain water provided to us, you want to build a facility that will take ocean water and make potable water instead of utilizing the existing water options available. Ignoring the other multitude of less expensive and more environmentally friendly and energy efficient options to solve the water problem is incomprehensible.

### Significant Environmental Impact

The willingness to ignore the contaminated hazards in both of these locations at this site is unforgivable.

Both sites in this location are contaminated from previous environmental facility blunders, and now you want to disturb the ground contamination to cause it to go airborne again to impact the residents of the close by and including farther communities. Digging the current soil hazards up and causing them to go airborne and then driving the contaminated soil debris through the cities to cause harm to millions of residents in the south bay area is unforgiving. There is no way to mitigate this hazard or harm with the blowing winds off of the ocean.

Disturbing known contaminated soil areas to provide a facility that does not meet the objective or needs of the many is not a smart decision.

We also truly do not know the effects any of the chemicals used in the desalination plant or the brine that is returned to our ocean water will have on our beaches, or the ocean water and marine life as we know it.

### Significant Financial Impact

The cost of construction to provide this desalination plant is over the top to say the least. You have an already existing Hyperion facility which can also produce potable drinking water and is currently not doing so. How it can be justified to spend this kind of money on a desalination facility when there are already existing facilities not working to solve the water issues currently, however those plants have the capability of doing this, and ability to upgrade already existing infrastructure to accomplish this without the enormous cost of a new desalination plant along with the disastrous side effects to our communities and our environment.

There is also an enormous negative impact financially to our communities as previously



PHE2-1

noted. This facility is costly in more than just financial ways.

There are a multitude of other alternatives to provide water at this time without spending over a half a billion dollars on one facility to provide for so few in the west basin area.

You must work together to combine resources and provide water with the entire state funding in mind; not divide projects without consent and understanding of other available options. The state is currently moving forward with plans of its own to build tunnels to transport water from other areas.

In Summary

You cannot in good faith vote for or look at the proposed enormously expensive, and not very efficient facility as a means to provide water to the west basin ratepayers. How do you plan to vote on this project without being able to answer the simple question of how much it will cost the ratepayers in the end, or the cost of the overall project and how it will be paid for if completed? This is not a testing ground for desalination proponents to move forward with their narrow vision and plan to make a profit off of ratepayers and residents. There are plenty of current desalination plants sitting idle that have not been capable of producing at a reasonable cost to provide water as promised. Look at the existing plants and you will in fact realize that desalination plants are not the answer to our water problems.

I cannot come up with any good reasons for continuing on such a detrimental path to move forward with this desalination plant. Yes, you can ultimately get water, but there are so many other far better and more conscientious ways to accomplish that. If this project moves forward all of us can only assume it is about the fact that someone will get paid and profit from the construction of this facility.

Thank you,  
Colleen Young,  
Manhattan Beach resident

Sent from my iPhone



PHE2-1

Wendy Phillips  
Manhattan Beach, CA 90266  
whyndy@icloud.com

June 25, 2018

Dr. Zita Yu, Ph.D., P.E.  
Project Manager  
West Basin Municipal Water District  
17140 South Avalon Blvd, Ste. 210  
Carson, CA 90746-1296

*via web submittal*  
*<http://www.westbasindesal.org/comments.html>*

Dear Dr. Yu:

**Re: Proposed Ocean Water Desalination Project (El Segundo): Draft Environmental Impact Report, released March 2018.**

I am a resident of Manhattan Beach. I am opposed to the proposed Ocean Water Desalination Project. My opposition is based on visual blight and adverse environmental impacts – in particular, to marine life and marine beneficial uses that would result from entrapment and entrainment as large quantities of raw sea water are drawn into the proposed desalination facilities, and from the creation of a zone of extreme toxicity off the coast of El Segundo from the discharge of large quantities of brine and backwash water. Also, I am concerned that the project proponent, West Basin Municipal Water District, would be making a large investment in infrastructure with high fixed costs and high energy and maintenance costs. I believe that more aggressive conservation and demand-side management are more cost-effective options to better align water consumption in the region with sustainable water supplies.

PHI-1

PHI-2

By way of background, West Basin Municipal Water District (West Basin) has prepared a draft Environmental Impact Report (EIR) for an Ocean Water Desalination Project (desal project). The desal project would be constructed along the coast of El Segundo at the existing 33-acre El Segundo Power Plant. After construction, West Basin would draw raw sea water at a flow rate of 45 million gallons per day (mgd) into facilities that would produce desalinated water for potable uses. This desalinated water would be distributed to water retailers in West Basin’s district for potable uses. Initially, the desal project would produce of 20 mgd, before expansion to 60 mgd. As noted above, to produce 20 mgd of desalinated ocean water, the desal project would need to draw about 45 mgd of raw ocean water (before expansion). This process would generate a waste stream of 25.4 mgd (before expansion) of brine and backwash water treated with ferric chloride. This waste stream would be discharged back into the ocean, offshore of El Segundo.

PHI-3

I understand that the cost of constructing the desal project is estimated at \$380 million and that West Basin proposes to fund construction of this plant using loans from the State of California’s State Revolving Fund. I assume that West Basin’s rate payers are expected to service this loan as well as fund on-going costs for operation, repair and replacement of equipment. The cost per acre-foot of constructing

PHI-4

and operating this new source of water – and the impact to rate payers and tax payers – is not clear in the draft EIR.

PHI-4

Among my concerns are adverse environmental impacts from West Basin’s proposed desal project, risks of operation, visual blight, and meaningful consideration of opportunities for a more cost-effective alternative.

PHI-5

1. **Environmental degradation – Water Quality:** Intake of large flows of raw ocean water, together with discharge of concentrated wastes through brine diffusers, would kill significant levels of marine life and create zones of toxicity on the ocean floor. This could affect a significant link in the ecology of the Santa Monica Bay, especially given existing brine discharges offshore of the Hyperion Wastewater Treatment Plant. More specifically:

PHI-6

**Zone of toxicity off-shore of El Segundo through disposal of brine and other wastes:**

Although desalination would not result in adverse thermal effects of once-through cooling water from the power plant that, in the past, discharged heated water along the coast, West Basin’s desal project would create a zone of toxicity as a stream of brine and backwash water (treated with ferric chloride) would be generated from the salts and particulate matter separated from the desalted water. This stream of brine, filtrate and backwash, with a flow of up to 25.6 mgd (before expansion), would be much saltier and denser than the receiving water on the ocean floor, and would be toxic to marine life. Not only would there be a zone of extreme toxicity, but such waste products risk the accumulation of toxic chemicals on the ocean floor over time, impairing benthic communities of fish, plants, and algae and the ecological balance of Santa Monica Bay.

PHI-7

**Intake of large flows of raw seawater:** Many coastal power plants have shut down or been extensively upgraded in recent years. While I recognize that a significant factor driving this trend is elimination of heated water discharged from once-through cooling towers, another significant factor is impingement and entrainment of marine life in coastal intakes.

The proposed design for West Basin’s desal project would draw in large quantities – up to 45 mgd before expansion – of raw seawater through screened intakes. Adverse impacts to marine life during the operation include:

- Impingement as marine life is trapped on intake screens.
- Entrainment into the desal project’s treatment train as small forms of marine life (e.g. plankton, fish eggs, larvae) are sucked in through intake screens.

PHI-8

West Basin does not propose to significantly reduce this adverse effect of impingement and entrainment by using well-developed technology such as a subsurface seawater intake – for example, intake through infiltration galleries or seabed filtration systems that could draw water through pipes that could be installed beneath the sea floor. Instead, West Basin plans to use intakes operated by the former power plant, with finer screens, and concludes that impacts from intake pumping for desalination would be less than impacts caused by the former power plant operator using once-through cooling towers. This does not seem to be consistent with California’s *Ocean Plan*,<sup>1</sup> which sets forth criteria for siting and design using technology that will minimize

<sup>1</sup> State of California, State Water Resources Control Board, “Water Quality Control Plan for the Ocean Waters of California (*Ocean Plan*) to address effects associated with the construction and operation of seawater desalination facilities” (Desalination Amendment), May 6, 2015.

mortality to all forms of marine life. West Basin presented much information on cost savings that it could realize by using the existing power plant intakes (with finer screens), but a clear comparison of marine mortality and habitat degradation during both construction and operational phases is missing. For example:

PHI-8

- It would have been helpful to have included a table that lays out various intake alternatives and quantifies adverse impacts to marine life during both construction and operational phases. I was unable to make such a comparison of various intake impacts – except for the cost comparison.

PHI-9

- I was unable to find an analysis of the trade-off between a lower intake rate (and associated decrease in mortality from impingement and entrainment) versus generation of a more concentrated brine and mitigation measures for the concentrated brine. I am concerned that West Basin not sacrifice a reduction in long-term adverse impacts during operation in order to realize short-term gains to marine mortality during construction. I assume it is more important to reduce long-term impacts of marine mortality during the life of the desal project and better preserve the link in the food chain of the Santa Monica Bay ecosystem as well as support of our beneficial uses of marine life.

PHI-10

Although West Basin may have plans to make environmental offset payments to a state mitigation fund, a better alternative would be to lower marine mortality through use of improved technologies such as subsurface seawater intakes. This would also result in more of a cost burden to rate payers.

PHI-11

2. **Environmental degradation – Visual:** West Basin fails to accurately disclose the visual blight that would result from homes and from important public vistas along The Strand, the bike path, the beach, and off-shore in north Manhattan Beach. Residents in this neighborhood and nearby areas as well as many visitors enjoy this area for a variety of activities – among which include recreation and spiritual enrichment. The proposed structures, with roof elevations at 85 feet above sea level, would degrade these activities, and I feel that the draft EIR is disingenuous in the way it compares the proposed roof elevations to another section of the site where a tank structure is not as visible to the public (and which, by the way, I don’t believe that the public opportunity to comment upon as construction predated requirements for disclosing environmental impacts per CEQA).

PHI-12

3. **Environmental degradation – Energy and air emissions:** Reverse osmosis is well known as an extremely energy-intensive technology, with concomitant emissions of greenhouse gases and other air pollutants. I do not believe that the addition of desalination capacity to our water supply merits this added adverse impact to the environment, especially when the more cost-effective alternative of aggressive water conservation measures (see #4 below) is available to stabilize demand and supply.

PHI-13

4. **Alternatives – More cost-effective ways to meet water demand:** Researchers have documented that desalination of ocean water is among the most expensive options, with a median cost of \$2,100 per acre-foot for large projects and \$2,800 per acre-foot for smaller projects; conservation, on the

PHI-14

other hand, is one of the most cost-effective ways to meet demand.<sup>2</sup> The draft EIR does not fully consider an alternative for a robust program to better control demand for water and the potential for more water efficiencies through conservation. For example:



- **Economic incentives for conserving water:** Although West Basin’s water retailers typically have tiered pricing for residential customers, the tiers do not appear to be set aggressively and many customers fail to respond to pricing signals that should kick in as their consumption increases above norms.
- **Economic incentives for more water efficient fixtures and appliances:** Many customers in my community do not seem to be aware of, or fail to respond to, rebates available to purchase more efficient fixtures and appliances. Either these rebate opportunities haven’t been adequately communicated and/or residents need more education on the importance of water efficient appliances and plumbing fixtures.
- **Billing practices:** Many customers in my community are unaware of how much water they typically use. West Basin and its water retailers need to come up with better billing formats, billing frequencies, and/or ways of communicating water consumption.
- **Landscape conversion:** Although many within West Basin’s district have converted their turf to a more sustainable landscape designs, there remains a significant amount of residential turf that uses large amounts of potable water for irrigation, especially in more affluent areas of the district.

These are just a few examples of areas where West Basin is well-positioned to be more of a leader in the areas of water conservation, efficiency, and demand-side management. West Basin could set up more rigorous programs to investigate and repair leaks from its distribution systems, and also provide support to water retailers for setting set up or upgrading leak detection programs. West Basin could start a water audit program to help residential customers understand norms vis a vis their water demand trends and efficiencies. West Basin could provide more guidance to its water retailers to better price and set rates for the water it they serve, and also send consumption signals to consumers. West Basin could easily help its water retailers improve their billing formats and procedures to better communicate water consumption trends and problems. West Basin could work more closely with manufacturers and sellers to market and promote more efficient appliances and fixtures. West Basin could advocate for better water consumption information in multi-family dwellings, including installation of sub-meters.

The draft EIR fails to adequately present this conservation alternative and the potential that a greater conservation push could have to help stabilize demand and bring it more in line with sustainable supplies of water.

5. **Poor operational history of desalination facilities in the region:** Desalination facilities in the region have problematic operating histories. For example:

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<sup>2</sup> Cooley, Heather, and Rapichan Phurisamban, “The Cost of Alternative Water Supplies and Efficiency Options in California,” Pacific Institute, October 2016 [http://pacinst.org/wp-content/uploads/2016/10/PI\\_TheCostofAlternativeWaterSupplyEfficiencyOptionsinCA.pdf](http://pacinst.org/wp-content/uploads/2016/10/PI_TheCostofAlternativeWaterSupplyEfficiencyOptionsinCA.pdf).



- **Claude “Bud” Lewis Carlsbad Desalination Plant:** Over the past couple of years, this desalination facility, also located at a coastal power plant, has had numerous permit violations<sup>3</sup> and has yet to bring toxicity at its coastal discharge point under control and within compliance of regulatory limits set forth in a RWQCB<sup>4</sup> permit for the facility’s discharge to the Pacific Ocean via the Encina Power Station Discharge Channel.
- **Redondo Beach Desalination Demonstration Project:** In February 2012, West Basin’s desalination demonstration project at Harbor Drive in Redondo Beach had a fish kill in the aquarium as the result of a chlorine leak. Thousands of fish were killed. It’s not clear if the chlorine leak was within the facility’s equipment or at the intake point. This incident and such operational risks are not disclosed and evaluated in the draft EIR.

↑  
PHI-20

PHI-21

West Basin’s analysis of risks and impacts in the draft EIR does not address, or does not adequately address, this concern about the ability of desalination projects in the region to meet stringent regulatory limits set to protect marine life and beneficial uses of the Santa Monica Bay.

PHI-22

Thank you for the opportunity to review the draft EIR and provide these comments. Please do not hesitate to contact me at (213) 576-6618 or my e-mail address (above) should you have questions.

PHI-23

Sincerely,



Wendy Phillips  
Certified Hydrogeologist, #388  
Certified Engineering Geologist, #1928

cc: Deborah J. Smith, Executive Officer  
CA Regional Water Quality Control Board, LA Region  
  
State Clearinghouse  
  
Council Members, City of Manhattan Beach  
  
Conner Everts, DesalResponseGroup.org

<sup>3</sup> California Integrated Water Quality System (CIWQS), a database maintained by the State of California, State Water Resource Control Board at <https://www.waterboards.ca.gov/ciwqs/publicreports.shtml>, which includes compliance history and violations for Carlsbad Desalination Project, Order No. R9-2006-0065, NPDES No. CA0109223).

<sup>4</sup> State of California, Regional Water Quality Control Board for the San Diego Region (Region 9).

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 3:41 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Linda Pollard

**Mailing Address:** Yeaton507@gmail.com  
**City:** El Segundo  
**State:** CA  
**Zip:** 90245

**Telephone # (daytime):** 310-322-4764

**Email Address:** Yeaton507@gmail.com

**Organization:** None

**Comments:**

The potential environmental impact as well as the overall cost and duration of the project do not support desalinization over more conservative and less expensive methods of water conservation and reclamation. I do not support the desalinization project.

┌ POL-1

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 5:46 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Joie Pompilio

**Mailing Address:** 416 35th St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 6198848731

**Email Address:** Joiepompilio@yahoo.com

**Organization:**

**Comments:**

Strongly oppose the entire project coming to the South Bay! If we are "stuck" with no vote to oppose the entire project then I would prefer the location NOT be the South site.

┌  
POM-1  
└

Mary Pope  
20622 Annrita Avenue  
Torrance, CA 90503

June 9, 2018

Mr. Patrick Shields, General Manager  
Honorable Members of the Board of Directors, West Basin Municipal Water District  
West Basin Municipal Water District  
17140 South Avalon Blvd.  
Carson, CA 90746-1296

RE: Response to Draft EIR

Dear Mr. Shields and Members of the West Basin Board of Directors:

I belong to a South Bay Environmental group that studies issues of importance to our communities. I have concerns about the proposed desalination plant on the coast in El Segundo.

It appears that the DEIR refers to El Segundo on the issue of noise pollution. This proposed area is right on the border of Manhattan Beach and could affect that city just as much, if not more, than El Segundo. The points of concern include noise, traffic, coastal access, and chemical spills.

Are you including Manhattan Beach equally with El Segundo when you study the impact on the surrounding population, ocean and land?

Thank you for your consideration of the above matter. Your response is appreciated.

Sincerely,

*Mary Pope*

POP-1

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 5:06 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** John Ramirez

**Mailing Address:** 224 38th Street  
**City:** manhattan beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3109945452

**Email Address:** ramirezjohnf@hotmail.com

**Organization:** concerned neighbor

**Comments:**

No, No No- this is a disaster waiting to happen! We do not want the water pollution, trucks, smog or noise from either sight! The proposed south site is a NON-starter. It will be awful! Do not do this project so close to our home and near where my children play. We are organizing the neighbors for a law suit! Thank you for your consideration, John Ramirez -224 38th Street Manhattan Beach 310.994.5452

RAM-1

**From:** West Basin  
**Sent:** Wednesday, May 9, 2018 6:06 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Michele Reniche

**Mailing Address:** 1557 19th Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3105457582

**Email Address:** mreniche@yahoo.com

**Organization:** 1957

**Comments:**

I am opposed to the proposed Ocean Water Desalination Project. It is neither cost-effective nor environmentally friendly.

REN-1

## Comment Letter RIZZI

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/30/2018	Joseph Rizzi	430 Heather Ct	Benicia	CA	94510	<p>Traditional Desalination has many draw backs in that it uses lots of expensive energy to force water through Reverse Osmosis (RO) tubes, the coastal land for desalination and power plants is costly and obtrusive in many ways, and the brine concentrate upsets the coastal waters balance. Natural Desalination eliminates all these problems and more. Looking at \$200 an acre foot and ability to extract trillions of gallons per year.</p> <p>Natural Desalination uses ZERO man made energy to desalinate new RIVERS of water with little to no environmental issues.</p> <ul style="list-style-type: none"> <li>- Ocean water needs 800 psi to desalinate using Reverse Osmosis (RO).</li> <li>- Off shore at 1,800 feet under the water you get 814 psi for the outside of a RO nano-tubes.</li> <li>- A small flexible pipe from the surface down to the RO system would bring 0 psi pressure down to the inner part of RO tubes and help water flow down hill.</li> <li>- The difference between the RO outside pressure and inside pressure gives a constant 814 psi, naturally at near ZERO cost.</li> <li>- Constant free trickle of salt FREE water into the inner part of the RO tubes.</li> <li>- Check valves would be strategically places to automatically close the flow of water if there was a break in the system.</li> <li>- Water from the RO nano-tubes would flow down hill to a collection chamber using gravity conveyance.</li> <li>- Gravity would continue to carry the water down hill to the pipe or tunnel and back to the shore.</li> <li>- Once at shore the water would be lifted for use or put in aqueduct or other transportation systems. CETO wave power can be used to lift the water near shore at no cost after installation. (See CarnegieWave on the internet).</li> </ul> <p>Natural Desalination advantages are:</p> <ul style="list-style-type: none"> <li>- Supply all of California with drought resistant water supply for crops and people. As much water as needed or desired.</li> <li>- No brine because only water is taken from the ocean, located far off shore an near the ocean floor helps too.</li> <li>- Extended life of RO tubes, which would be cleaned by the ocean currents, not need pre filters or chemicals.</li> <li>- RO trains (Collection of Tubes) would cost a fraction because only the tubes are needed not the containers that the tubes go into.</li> <li>- Located off shore offers large areas (miles) for RO system for expansion with no impact to coastal residents.</li> <li>- Positive impact to ocean, plants or sea creatures; and no shipping hazard, due to location and design.</li> <li>- Side benefit of increased water would be more farming, increased economic, more oxygen, cleaner air, etc..</li> <li>- No Droughts, Healthy Delta, great water quality, reduce sea level rising and many other water problems can be decreased or eliminated.</li> </ul> <p>All proven concepts but getting a pilot program will be difficult due to the upfront costs.</p>

RIZ-1

**From:** West Basin  
**Sent:** Monday, April 23, 2018 3:07 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments  
**Attachments:** EconoPure - EP-DEMWAX-II-White-Paper.pdf

---

Comments - Form from West Basin Desal Site

**Name:** Joseph A Rizzi

**Mailing Address:** 430 Heather Ct  
**City:** Benicia  
**State:** CA  
**Zip:** 94510

**Telephone # (daytime):** 7072084508

**Email Address:** Joseph\_Rizzi@sbcglobal.net

**Organization:** Natural Desalination

**Comments:**

Natural Desalination or Demwax uses only nature to desal water with no harm to environment. All you supply is power to pump up the fresh water. Please contact me for a full presentation. You can have 100% of your water from the ocean and reduce your cost for water as well as never have to worry about drought again.

RIZZI-1





An EconoPure™ White Paper

**EconoPure™**  
Water Systems

[www.EconoPure.com](http://www.EconoPure.com)

# DEMWAX II

(Patent Pending)

Second Generation Depth Exposed Membrane  
for Water Extraction (DEMWAX™) for  
seawater and brackish water desalination

*By: Curt Roth*

*Vice President, Engineering  
EconoPure™ Water Systems, LLC.  
[curt@econopure.com](mailto:curt@econopure.com)*

and

*Diem Vuong*

*Chief Technology Officer  
EconoPure Water Systems, LLC  
[diem@econopure.com](mailto:diem@econopure.com)*

September 2015 v2



## **Introduction**

The Depth Exposed Membrane for Water Extraction (DEMWAX™) is a novel approach to both fresh surface water treatment and seawater desalination that deploys a system directly within the source water body, utilizing the natural pressure that exists at depth. DEMWAX II, a second generation of the original system, brings this natural pressure based system onshore, providing the similar type of energy savings without the disadvantages of offshore operation. Unlike the original DEMWAX it is not dependent on ocean depth in its immediate vicinity and so has worldwide ocean-side applicability. This configuration has many advantages over the incumbent technologies. The base technology is patented and other associated patents are pending. This paper provides detail on the DEMWAX II system and its comparative advantages.

## **Basic Theory**

The idea behind the DEMWAX II™ system is harnessing natural water pressure (hydrostatic pressure from water depth) to drive a reverse osmosis process in lieu of artificially created pressure. The system employs membranes where natural pressure can be created in deep well bores. Water movement is created by bringing in feed water through an upper ocean pipe and out through a lower ocean pipe, passing through membranes at the bottom of an internal open tube in the well bore. The DEMWAX II system has many applications (see discussion below) but the two primary applications are the desalination of seawater and the treatment of brackish or fresh water inland.

For both primary applications, there are four basic premises or design traits behind the technology.

1. Natural water pressure variable in amount: Well bores of increasing depths provide increasing pressure accommodating characteristics of both existing source water and required product water specifications.
2. Atmospheric pressure communication: Communication of atmospheric pressure to the membrane permeate collection tube allows the natural creation of the pressure differential needed for the process. This differential is maintained by pumping the permeate water to the surface.
3. Water movement: All membrane processes require the movement of feed water to the membrane surface and removal of the concentrate or brine. Membrane in the DEMWAX II system are designed so that gravity and small pump lifts remove any concentrate and brings more water to the surface of the membranes. The spacers between the membranes are at least 3 times those used in traditional SWRO configurations allowing for an uninterrupted flow of water between them.

4. **Low flux:** Membrane flux (produced water per unit of membrane area) is often associated with system efficiency in traditional systems. That is, higher flux means less pre-treatment costs, less membrane, fewer pressure vessels, etc. However, higher flux also means higher transmembrane pressure and higher velocities into the membrane face. Low flux, on the other hand, reduces the driving pressure requirement. Low flux also reduces stress and fouling on membranes increasing the effective life and reduces particulate fouling.

## **New Paradigm**

Most research in seawater desalination has focused on reducing the energy requirements, as that remains the largest cost component of desalination plants today. There are physical limits in energy required for separating dissolved ions from water and these limits bound the efficiency gains that are available. For any membrane desalination process the recovery rate (ratio of permeate to feedwater volumes) dictates the energy requirement as it defines the concentration of the water fed into the system and the required separation energy is proportional to concentration of a solution, in this case salt and water.

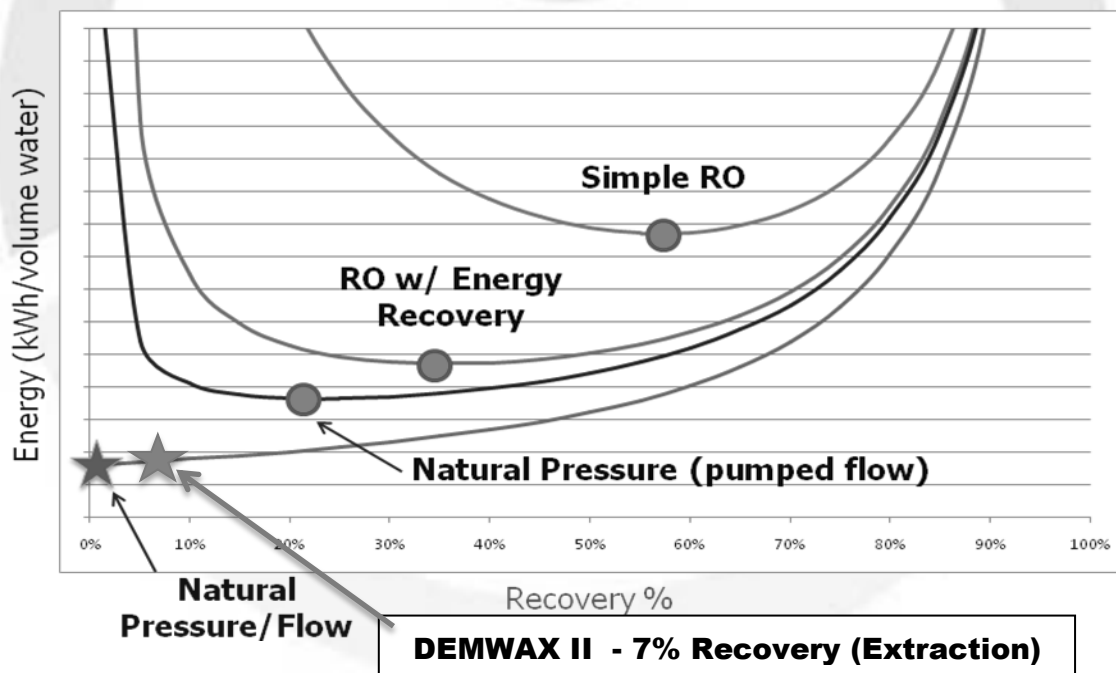
In the past, systems have found optimal operating points that balance the pressure and the volume of the feedwater. That is, low recovery means low salt concentration in the feed water and therefore low pressure because osmotic pressure is proportional to concentration. However, low recovery also means processing higher volumes of feedwater (albeit at a lower pressure). This limitation is represented by parabolic cost curves when plotting energy requirements against the rate of recovery. Optimum operating points often reflect the recovery rates at the minimums of these cost curves.

The figure below shows a series of such cost curves. The uppermost cost curve shows the case for simple reverse osmosis (RO). In this case one can see that raising or lowering the recovery rate increases the energy cost of the process from the minimum at about 60% recovery. A process that can lower the recovery and therefore the pressure required, must, by definition, pump more volume at the lower pressure. Conversely, a process designed with higher recovery can pump less volume, but must pump that volume at higher pressure given the increase in concentration. The minimum energy for such simple RO processes tends to the 50 to 65% range.

With the advent of efficient energy recovery devices, the optimal operating point started shifting to lower recoveries as can be seen on the second, lower cost curve in the figure. As energy recovery devices allowed beneficial use of the residual brine pressure, there is less waste associated with the pressurized water not converted to potable. Thus, optimal recovery rates tended lower, 30 to 40%.

Still lower energy consumption is possible by using the natural hydrostatic pressure. Researchers have successfully attempted this by submerging a spiral wound membrane system to depth in the sea. The natural pressure did the work of the pump on a traditional shore based system. However, the produced water pumped to shore had to overcome the same head of pressure used in the treatment process, seemingly eliminating the benefit. However, only the produced water must be pumped rather than the far more voluminous feed water, thus generating savings.

Past natural pressure systems were designed with membrane configurations specifically designed for traditional shore based systems. These membrane elements required water be pushed through them since they were designed for systems where water is moved with pumps. In these cases the optimal recovery rate (and energy requirement) was lower than the shore based system but were limited on the low end by the fact that these systems still required pumping the flow of the feedwater. The pumping was not for static pressure, as that existed infinitely in the sea. Rather, it was only for the movement of the feed in the volumes associated with the recovery. This limitation can be seen on the third cost curve by the steeply increasing curve at very low recovery rates.



**Figure 1 - Energy vs. Recovery**

The final cost curve represents the case of the original DEMWAX™ system, using natural static pressure in the sea, but also designed to capture natural movements of the feedwater. That system used the natural forces of gravity and currents in the ocean to naturally move the feedwater. In this case, the energy requirement tends toward the physical limit at a zero recovery.

With DEMWAX II, nearly the same energy cost savings are produced onshore with a column of water inside a well bore. To do this, the inflow to the open tube containing that water column is configured several feet above the outflow from the well bore to allow gravity to move the concentrate down through the system and into the ocean. The only added energy as compared to DEMWAX then is what is required to lift the feed water the few feet to drive the movement of the feed water.

The membrane cartridge is comprised of multiple cylindrically wound reverse osmosis membranes spaced with specially designed spacers to minimize head loss. The membranes are directly exposed to the seawater in the water column. The voids between these membranes are open on the top and bottom to allow water to naturally pass through. The lower recovery rate, and thus lower pressure requirement, results in significantly reduced capital, operating and environmental costs typically associated with traditional SWRO systems. The depth needed for the DEMWAX II system in the ocean is approximately 300 meters<sup>1</sup>.

### **Energy Efficiency**

The result of the DEMWAX II design is a low energy process that harnesses natural forces efficiently. For DEMWAX II the power reduction is approximately 65% versus current state-of-the-art traditional SWRO systems. In general terms, this reduction can be summarized as half the flow at half the pressure. A typical large scale SWRO plant with energy recovery uses approximately 16 kilowatt-hours per thousand gallons of product water (or about 4.2 kWh/m<sup>3</sup>). A SWRO plant that operates at 50% recovery must pre-treat and pressurize 2 gallons of feed water to yield 1 gallon of product water. At a target of about 7 percent recovery, the DEMWAX II system only needs to pump the 1 gallon of product water (besides the 16 gallons of very low-pressure inflow) or about half the flow as compared to a traditional SWRO plant.

To achieve the 50% recovery, a traditional SWRO system must reach a pressure of nearly 800 to 1,000 psi (55 to 69 bar). As osmotic pressure for typical Pacific Ocean seawater is approximately 320 to 350 psi (22 to 24 bar), the required pressure is more than twice osmotic. Since the DEMWAX II is designed to operate at extremely low recovery; the

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<sup>1</sup> Past natural pressure systems required much greater depth in order to achieve the osmotic pressure of the more concentrated feedwater due to the higher recovery rate. See, for example: Paolo Pacetti, et al, "Submarine seawater reverse osmosis desalination system," *Desalination* 126 (1999) 213 – 218.

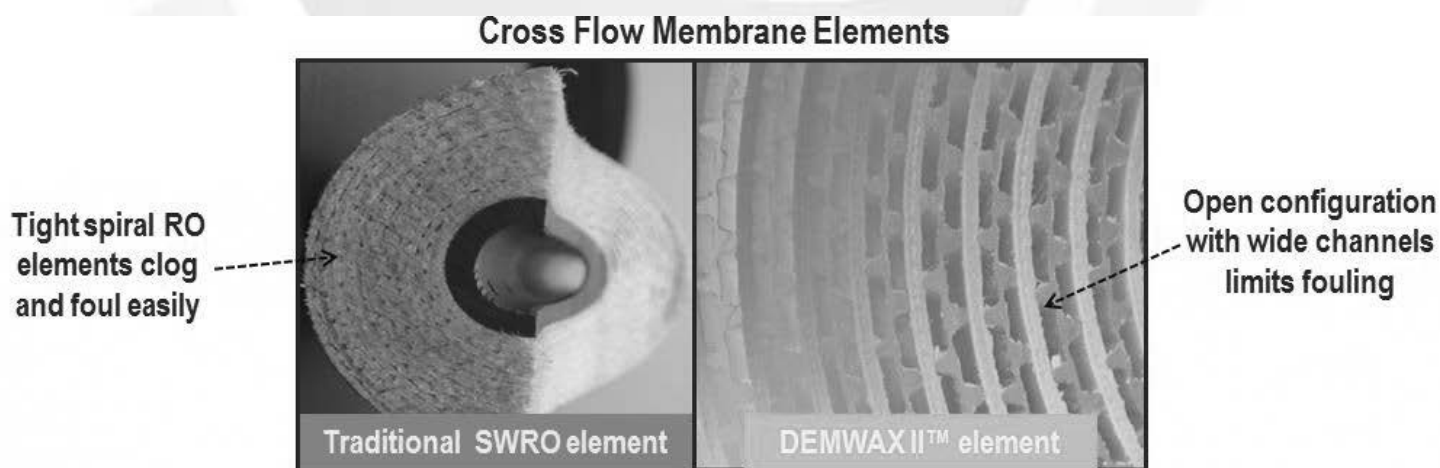
required pressure is only slightly higher than osmotic at about 350 to 400 psi (24 to 28 bar) or about half the pressure of a traditional onshore SWRO plant. This required pressure is supplied by the differential between the water column in the well bore of source water and that in the permeate collection tube.

### Water Flow and Membrane Spacing

For all membrane processes, effective transfer of source water to the membrane surface, and the removal of concentrate from the membrane surface are critical. In the spiral wound configuration, a raw water spacer is used to create a channel between the membranes to convey the source water and brine. Normally, this space is very small, on the order of 0.03 inches (0.76 mm). In a static seawater environment, even at high pressure, the feedwater and brine would not flow efficiently to match the flux and avoid excessive concentration at the membrane surface without mechanical means to remove the brine. The close spacing of the traditional spiral wound membrane would inhibit flow if no mechanical means were used.

The DEMWAX II system solves this problem. Instead of trying to force the water through a small channel, the membranes in the DEMWAX II system, by virtue of the wide specially designed spacers, have a much larger channel (increased spacing between membranes) reducing the associated friction loss. In addition, the membranes are oriented vertically to allow gravity to assist this flow. As the concentration of the seawater on the high-pressure side of the membrane increases, so does its density due to incremental increase in salinity as fresh water is extracted. Since the more dense water is slightly heavier, gravity (g) will induce a flow of the dense water from top to bottom.

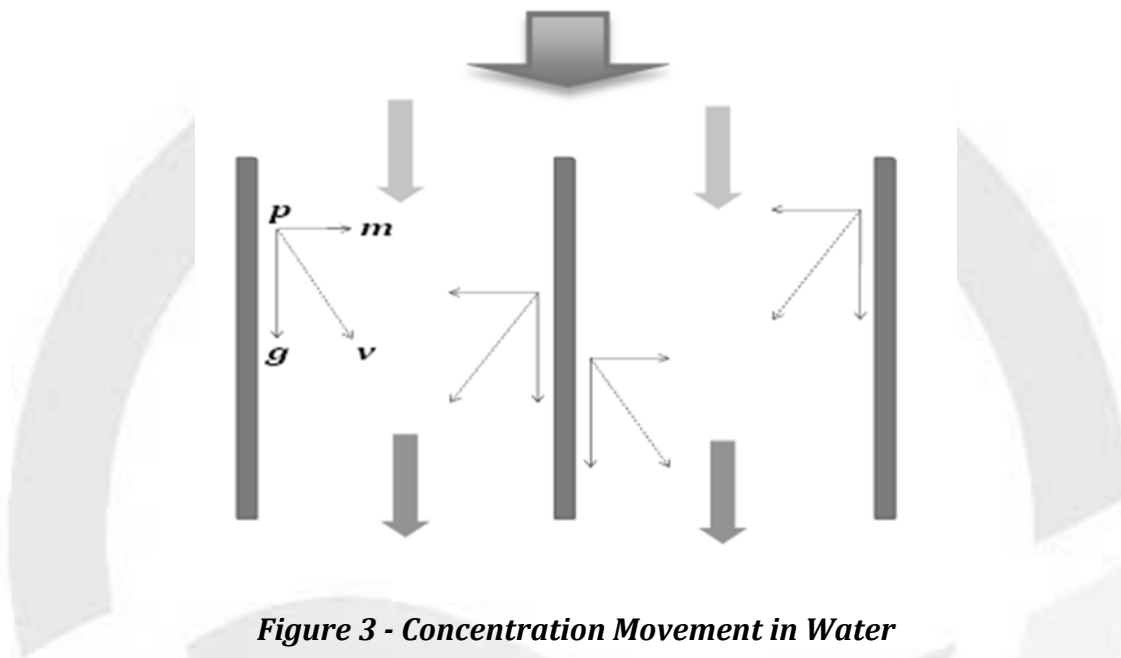
Figure 2 compares traditional SWRO tight wound membranes to the DEMWAX II open channel technology permitting less energy, less fouling and less maintenance.



**Figure 2 - Membrane Elements**

The natural mixing effect ( $m$ ) will pull the extra concentration of dissolved solids away from the face as is shown in *figure 3*. When some product water penetrates the membrane, the feed water right on the face of the membrane ( $p$ ) is temporarily concentrated. As all solutions in nature seek equilibrium with regard to concentration (like a gas filling its container), the concentrated water right at the point of production ( $p$ ) will ‘jump’ away from the membrane to mix ( $m$ ) with the lower concentration water in the middle of the channel between the membranes.

### Hydrostatic Gravitational Flow



**Figure 3 - Concentration Movement in Water**

*Figure 3* shows an exaggerated cross-section of three membrane elements and the two channels they create. The DEMWAX II Membrane Cartridges are designed for this flow to occur naturally in perfectly still water, though that is never the case as inflows and outflows and gravity ( $g$ ) generate the mixing ( $m$ ) replenishing new feedwater when concentration briefly occurs.

This concentration movement is not as pronounced for fresh water applications. However, the concentration buildup is not as large, nor is the osmotic pressure nearly as significant.

The combination of these three effects, downward water flow, the gravity pulling down the higher density water and the mixing effect pulling toward the middle of the channel, will pull the flow in a vector ( $v$ ) away from the membrane and down toward the floor of the well bore then back up through the outlet. As the water moves down and out of this space, more feed water will enter from the top in a constant circulation.

In conjunction with the smaller flux (30-50% of typical SWRO), the draw of water molecules out of the source water is also small in relation to the available volume between the two sheets, so the brine water is only slightly concentrated (5 to 7%) toward the bottom of the channel between the membranes.

### **Pressure and Flux**

As mentioned previously, the main parameter in determining the required pressure (depth) for the DEMWAX II is the osmotic pressure of the source water. Osmosis is defined as the net movement of a solvent molecule (e.g. water) through a semi-permeable membrane from the side of lower concentration to the side of higher concentration to balance the concentrations. The osmotic pressure is the amount of pressure applied to the high concentration side of the semi-permeable membrane to prevent osmosis from occurring. In other words, the osmotic pressure creates a steady-state for two solutions where no movement occurs across the membrane. If the applied pressure is less than the osmotic pressure, natural osmosis occurs. If the applied pressure is greater than the osmotic pressure, then the flow of the solution from the high concentration to the low concentration occurs. This is reverse osmosis.

The theoretical calculation for the osmotic pressure of a solution is based on the summation of the molarity of the different molecules and the temperature of the solution. The molarity is defined as the number of molecules in the solution divided by the volume of the solution. In general, the osmotic pressure can be approximated by dividing the Total Dissolved Solids (TDS) in mg/l by 100 (e.g. 35,000 mg/l TDS = 350 psi (24 bar)).

The actual required osmotic pressure is the differential between osmotic pressure of the brine and the osmotic pressure of the permeate water.

The other pressure component that determines the required depth in addition to the osmotic pressure is the transmembrane pressure (TMP). The TMP can be thought of as the 'friction loss' across the membrane added to the driving pressure needed to produce the required flow. Just like any 'conduit,' there is a certain amount of energy required to move the water through the membrane at a certain flow rate. In order to get a particular flow through the membrane, the pressure must be greater than the combination of the osmotic pressure and the TMP at that flow. For SWRO membranes the TMP can be as high as 120 to 150 psi (8.3 to 10.3 bar) for the normal high flux operations. However, in the low flux DEMWAX II applications, it is approximately 20 to 40 psi (1.4 to 2.8 bar). For NF membranes it is even lower at approximately 10 to 20 psi (0.7 to 1.4 bar).

As the osmotic pressure is a fixed constant of the source water, technological advances in membrane construction can only improve (lower) the transmembrane pressure requirement. Since the DEMWAX II system can accommodate any membrane, such



advances can be easily incorporated if warranted. However, the transmembrane pressure for seawater applications is a small fraction of the total pressure required, so the system is near the theoretical minimum energy.

The resulting total driving pressure for seawater desalination applications of the DEMWAX II system is approximately 370 to 400 psi (850 to 950 feet of depth or 255 to 285 m) based on a typical Pacific Ocean salinity. This will put the membrane cartridges at a comparable depth in the well bore.

Fresh surface water is generally low in dissolved solids (usually less than 1,000 mg/l), thus does not require significant osmotic pressure (about 10 psi). Using a mid-range (50% removal) NF membrane, the required driving pressure is on the order of 25 psi (55 feet or 16.8 m) for a medium range flux. However, well bore depths required for the myriad of different applications can span a broad range depending on source water constituents, desired treatment and flux requirements.

Many fresh water bodies, especially in mountain regions, are exceptionally clean and require filtering out larger biological contaminants only. In this case, a 'loose' nanofiltration DEMWAX II can be submerged into approximately 20 to 30 feet (9.1 m) of water in the well bore. If a water source is high in calcium carbonate, such as the lower Colorado River in the United States, a well bore depth in a reservoir of approximately 75 to 100 feet (22.9 to 30.5 m) can remove most of the calcium. However, as calcium carbonate is relatively harmless (though not to fixtures or water heaters) the DEMWAX II can merely treat the water for larger molecular contaminants at a far lesser well bore depth.

### **General System Description**

The basic components are the same for either of the primary applications and include the following:

- DEMWAX II Cartridge Module – Composed of membrane cartridges, permeate tube interface, and submersible permeate pump.
- Well Bore – cased to variable depths and diameters, source water and product water dependant. It is the basic structure and connects to the outflow pipe, which is lower in elevation than the inner tube inflow pipe.
- Inner Tube – Open tube top and bottom feeding source water through inflow pipe higher in elevation than well bore outflow pipe. This provides the moving water column generating the necessary pressure differential to drive the reverse osmotic action.

- Permeate Tube – Small diameter tube inside the inner tube to transport permeate to ground level storage tank/municipal water utility.
- Electrical and control umbilical – Power for the pump and instrumentation cable to provide control of the pump and system monitoring are required.
- Ancillary systems – These systems include the power source, monitoring instruments, cleaning/fouling prevention systems, etc.

**Figure 4 - General DEMWAX II Plant Layout Comparison**

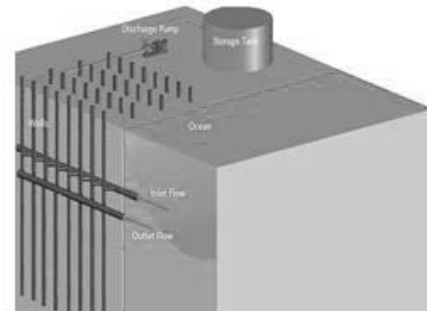
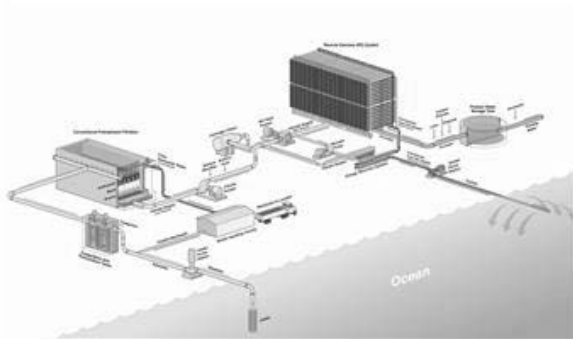
## Visual “Water Park” Economics

**Current state of SWRO art**

**DEMWAX II Water Park**

*APPROXIMATELY 6 ACRES*

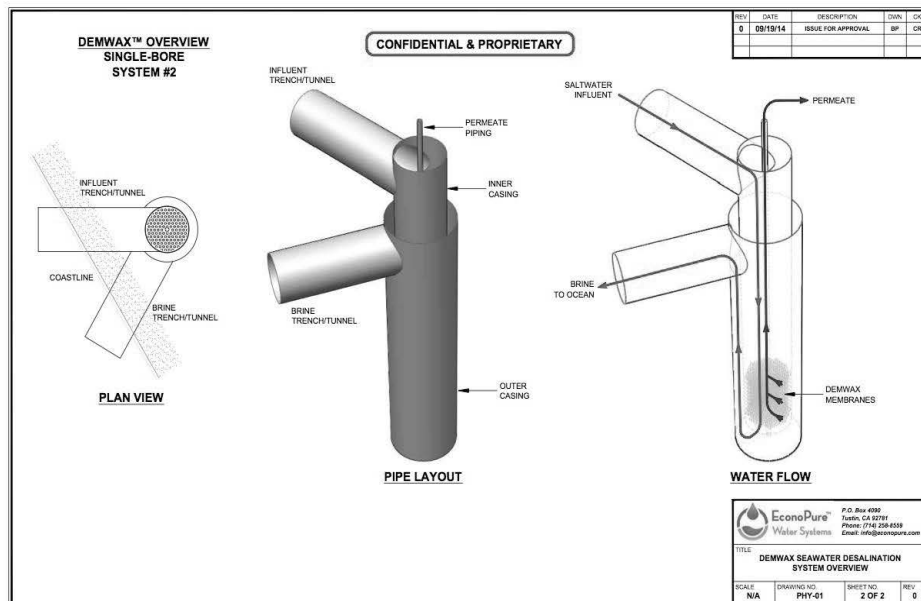
*ONLY ABOUT 1 ½ ACRES*



*NOT TO SCALE— FOR COMPARISON PURPOSES ONLY*

Figure 4 provides a schematic of the general DEMWAX II plant configuration in comparison to a traditional SWRO plant graphic.

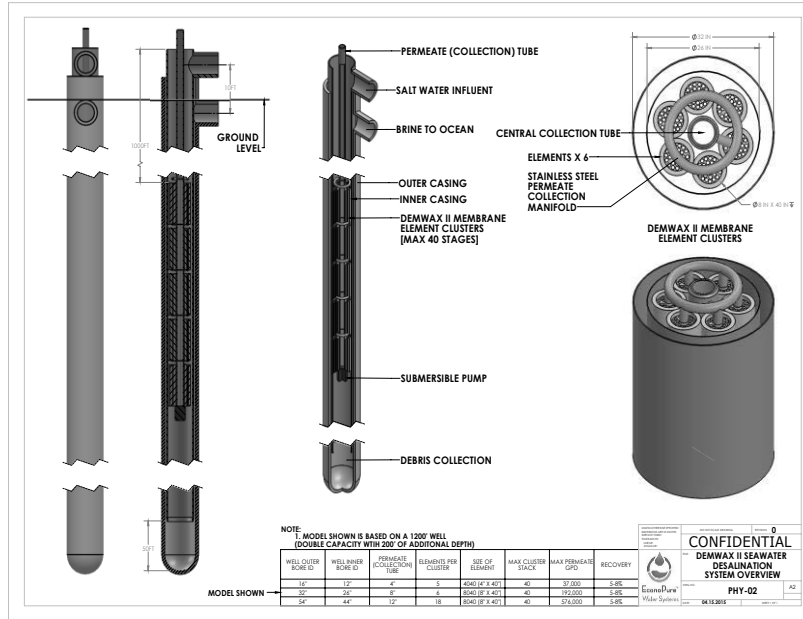
Figure 5 shows a not-to-scale concept rendering of a DEMWAX II system. In this image, the membrane cartridge and permeate tube is the blue system inside the inner tube. The water flow in and out is illustrated in red. And the inflow/outflow differential both in elevation and direction is shown in the solid works center figure. Note that the inner tube is open at the bottom (for removal of brine) and at the top to atmospheric pressure creating the necessary pressure differential to effect the reverse osmotic process.



**Figure 5 – DEMWAX II System**

Figure 6 provides some concept detail for the system; both the fresh water version and the seawater version would be the same with the exception of the depth and the distance from shore.

# DEMWAX'II'Concept'Detail'



**Figure 6 - DEMWAX II System Detail**

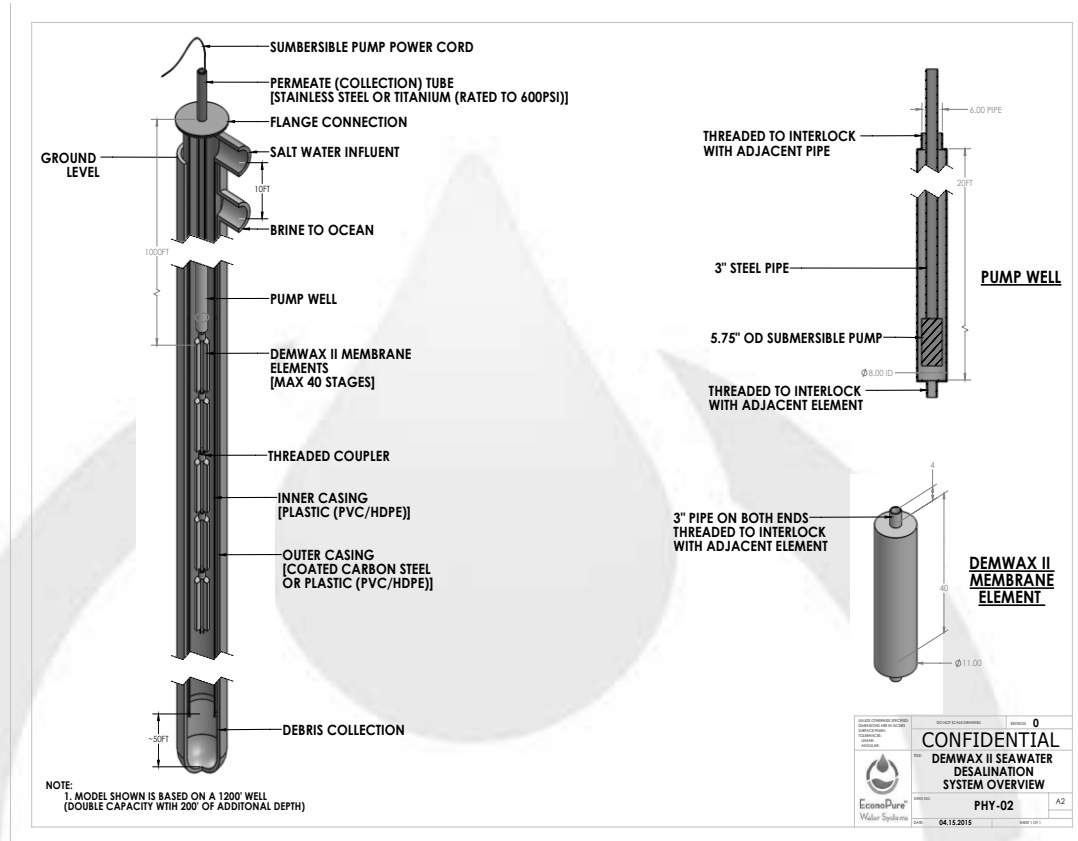
## Membrane Cartridge Cluster

The basic component to the system is the membrane cartridge cluster. A typical cluster will contain a number of spiral wound membrane cartridges (vertically arrayed) connected to the permeate collection manifold which in turn is connected to the permeate collection tube. Multiple clusters can then be stacked in quantity necessary to produce the design capacity of the system. For example, illustrated in Figure 6 there are six cartridges per cluster with a maximum stacking of 40 clusters in the 1200' deep 32" diameter well bore which will produce 192,000 gallons of permeate per day. Each cylindrical cartridge is 8" in diameter and 40" long.

## Advanced Development

With initial acceptance of the DEMWAX II technology we anticipate further technological development for major, high volume applications. One such advance will be the direct interface between the membranes and the permeate collection tube. *Figure 7* illustrates such advance.

## Value Engineering Advance



There should be several advantages to this development, the most important of which is the increase in square foot of membrane per available inner tube volume. It will directly increase output and efficiency.

### Ancillary Developments

As with other advances in technology we anticipate cost savings with learning curve progress and volume manufacturing of pumps, spacers, cartridges, manifolds, connections and instrumentation.

### Competitive Advantages

DEMWAX II offers many competitive advantages as compared to traditional seawater desalination and fresh surface water treatment systems. The value of the technology is derived from these competitive advantages. Many of these advantages have already been described in detail. The purpose of this section is to provide a concise summary of the concepts. The advantages are listed with a discussion of the primary applications, seawater and surface water, where warranted.

The primary competitive advantage is that DEMWAX II is dramatically less expensive than existing methods of desalinating and processing water.

### ***Energy Efficiency***

*Seawater or brackish water* – “Half the pressure, half the cost” is a general way to describe the DEMWAX II efficiency. In reality DEMWAX II will save more than half of the energy associated with traditional SWRO. The only generated power necessary in the inflow pump, a low-head-high-efficiency pump and the small permeate pump in the inflow tube. The main power sources are hydrostatic pressure and gravity.

### ***No Pre-treatment Required***

*Seawater* – Onshore plants force feedwater through extremely closely spaced membranes at high pressure and velocity. Suspended solids in the source water become abrasive projectiles that damage the membranes. Thus, traditional SWRO plants employ a costly pre-treatment process applied to all the feedwater (about twice the product water) which removes these organics and sediments. Suspended matter in the source water just flows harmlessly through the DEMWAX II membranes, making any pre-treatment unnecessary.

### ***Higher Quality Product Water***

*Surface water* – The nanofiltration membrane used by DEMWAX II to treat surface water removes far more contaminants than ultrafiltration or microfiltration membranes which are becoming common today. The increasing level of man-made contaminants, such as dissolved pharmaceuticals, in water sources requires that a more robust treatment process be implemented and regulations are increasingly stipulating higher water quality.

### ***Mitigation of ‘Brine’ Disposal***

*Seawater* – Brine disposal is an issue that must be addressed in traditional reverse osmosis plants. Because of the low-recovery process, DEMWAX II will only create ‘brine’ that is approximately 7% more concentrated than the surrounding ocean. Such low levels of concentration will mix back to ambient within a few feet of exiting the outflow channel.

### ***Virtual Elimination of Sea Life Impingement and Entrainment***

*Seawater* – The impingement and entrainment of sea life is another environmental hazard that haunts many power and desalination plant entitlement efforts. The velocity through the “intake” of DEMWAX II is an order of magnitude less than that in typical desalination plant intakes.

### ***Less Land; Economies of Factory Assembly***

Aside from the well bores, channels and attendant piping, there is little site construction necessary in a DEMWAX II water park. The element manifold and assembly can be constructed offsite and delivered turnkey. This eliminates the need for additional expensive coastal land for onsite assembly. Additionally there is less expensive ocean side land used in that water park, typically 75% less than land used by a modern SWRO plant.

### ***No Moving Parts Subject to the Corrosive Feedwater***

Traditional desalination plants incur significant capital and maintenance costs due to the handling of highly corrosive salt water and doubly concentrated brine. DEMWAX II only exposes the outside of the polyamide (plastic) membranes to the feedwater, thus eliminating the corrosion potential on the pumps. Similarly, all surfaces exposed to the salt water will either be composed of non-corrosive materials or coated with such materials.

### ***Economic Restoration of Natural Surface Waters with DEMWAX II “Distributed Desalination”***

The DEMWAX II system is highly scalable allowing for smaller more efficient coastal water parks closer to population centers. Contrast that with the fact that there are surface water conveyance systems in the world that require far more power than the DEMWAX™ requires to produce water from the sea. As an example, the California State Water Project conveys *untreated* water from the Sacramento River Delta to Southern California at an energy cost of approximately 2.5 kilowatt hours per cubic meter. Similarly, the Colorado River Aqueduct requires approximately 1.6 kilowatt hours per cubic meter to convey *untreated* water to the coastal populations of Southern California. DEMWAX II will require about 1.4 kilowatt hours per cubic meter to produce *potable water* on shore which will not require further treatment as these other sources will (extra energy and chemicals). In addition to the energy efficiency proposition, there is an environmental value to restoring native waterways or utilizing those waters for inland purposes.

### ***Significantly reduced carbon footprint***

With a dramatically reduced generated power requirement comes a corresponding reduction in CO<sub>2</sub> emissions, making DEMWAX II truly a ‘green’ technology.

## ***Conclusion***

The quest for energy efficient and environmentally benign methods of extracting potable water from seawater has witnessed a series of incremental advances over the past two decades. Many experts in the field believe we are at the end of the road for improving the efficiency of seawater desalination. However, the new paradigm represented by DEMWAX II will dramatically improve efficiency while testing the physical limits of efficiency. It will do this while also improving the environmental profile by mitigating brine disposal and sea life impingement/entrainment issues.

### **Contact:**

**Daniel Bertram**

*Chief Executive Officer*

**EconoPure™ Water Systems**

+ 1 (619) 987-1818

daniel@econopure.com

### **Alternate Contact:**

**Tom Motherway**

*Corporate Secretary*

**EconoPure™ Water Systems**

+1 (775) 287-1807

tom@econopure.com



## Comment Letter SABOSKY

**From:** Justin Sumi  
**Sent:** Wednesday, March 28, 2018 4:33 PM  
**To:** Noemi Luna  
**Subject:** RE: West Basin Desal Site Comments

---

Terri Sabosky has been added to the smartsheet

---

**From:** Noemi Luna  
**Sent:** Tuesday, March 27, 2018 3:37 PM  
**To:** Justin Sumi <jsumi@mbimedia.com>  
**Cc:** Jennifer Lao <jlao@mbimedia.com>  
**Subject:** FW: West Basin Desal Site Comments

Justin,  
Below is a COMMENT to be saved in the West Basin Public Comments in Smartsheet. Save the details and the email as an attachment.

Notify Jenn and I once this has been completed.

--

Noemi Luna  
Project Manager



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**From:** Terri Sabosky [<mailto:tsabosky@lawa.org>]  
**Sent:** Tuesday, March 27, 2018 3:15 PM  
**To:** Noemi Luna <[nluna@mbimedia.com](mailto:nluna@mbimedia.com)>  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Terri Sabosky

**Mailing Address:** 2209 Harkness St  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 92066

**Telephone # (daytime):** 310 630 7163

**Email Address:** [tsabosky@lawa.org](mailto:tsabosky@lawa.org)

**Organization:**

17-165

## Comment Letter SABOSKY

**Comments:**

I think building a desalinization plant is fantastic and I am thrilled you are moving forward with this project. Those who are opposed are simply foolish and not looking out for all who live in the area. When the drought hits hard again, this plant will be blessing. Thank you for all your hard work.

SAB-1



Donald Dear (West Basin Board of Director) , Gloria Grey (West Basin Board of Director), Carol Kwan (West Basin Board of Director), Scott Houston (West Basin Board of Director), Patrick Shields (West Basin General Manager), Steve O'neil (West Basin Legal Counsel), Zita Yu (West Basin Staff), Julie Frazier-Matthews (West Basin Staff), Connor Everts (Desal Response Group) , Annelisa Moe (Heal the Bay), Amanda Sackett (Surfrider Foundation),

Donald: Thank you. And now?

Julie: And the last speaker is Amanda Sackett.

Amanda: Hi, Mandy Sackett, Surfrider Foundation California policy coordinator, um, with our global headquarters. I'm here on behalf on behalf of our South Bay Chapter, Craig Cadwallader. Um, as some of you know, we've talked about this morning, Craig, um, Craig's been really active on the West Basin Desal Project and has attended nearly every board meeting and, um, committee meeting for quite some time, and unfortunately, he's been hospitalized for about 15 days now, and had to go in emergency surgery. He really wanted to be here today, so I'm here on his behalf, um, and I wanted to support the request for a permit extension.

SAC-1

Um, we – and I also wanted to mention that we believe the absence of any board members at the April 25<sup>th</sup> workshop was, um, unacceptable. We, we do believe that elected official representatives' main priority should be to consider feedback from their constituents, and the workshop was a primary and really important way to do that.

Um, so, in leu of that absence, we think more time would give us more thorough feedback to board members, and then, also, this, the draft EIR incorporates some new elements that we need time to consider, including the 60 MGD project and a new project location, and the delivery system, um, then what was presented in previous meetings. And then, finally, um, as we mentioned in our joint letter, um, we do want some more time to review some of the extensive and lengthy documents.

SAC-2

Um, and so, I'll just keep it short and, um, also just add that, you know, Craig is an avid activist and community leader on this issue, would really appreciate a little more time, as well, in light of his, um, emergency health setback. So, thank you very much for your time this morning.

Donald: Thank you. Is there anyone else? Yes, uh, Director Gray?

Gloria: Would you please send Craig my best regards for a speedy recovery?

Amanda: Yes.

**From:** West Basin  
**Sent:** Monday, June 18, 2018 7:28 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Steve Salas

**Mailing Address:** 1202 E Mauritania st  
**City:** Wilmington  
**State:** CA  
**Zip:** 90744

**Telephone # (daytime):** 310 9715765

**Email Address:** Letsgetrich1@yahoo.com

**Organization:** City Of LA employee/ Home owner

**Comments:**

I am against this project. We the people should desalinate our ocean as a last resource. I recommend West Basin board and other agencies should work together to buy back Refinery water rites and Refineries reuse reclaimed water (purple pipes) as an offset with no cost to the Refineries. LA County has over 5 Refineries in our region. Tesoro EIR project claimed that Tesoro uses over 13.5 Million gpd of fresh water a day and 4.5 Million gpd of reclaimed water alone. We still have other Refineries to consider reclaimed water use and fresh water use.

SALA-1

**From:** West Basin  
**Sent:** Saturday, April 7, 2018 3:55 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Laura Salonen

**Mailing Address:** 1140 Highland Avenue #154  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** laurakaksi@yahoo.com

**Organization:**

**Comments:**

The proposed locations for the desalination facility are too close to a residential area - the El Porto section in north Manhattan Beach. The expected impact on residents, such as noise and air pollution is of great concern. Construction of a project of this size would create a major traffic problem affecting one of the major north-south gateways into and out of Manhattan Beach - Vista del Mar/Highland Ave. If the project has to be located at a beach site, why not place it to the north across from the Hyperion Facility or the Scattergood generating station where there are no residences.

SALO-1

**From:** West Basin  
**Sent:** Monday, May 14, 2018 8:32 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Angelina Sberna

**Mailing Address:** 836 Manhattan Avenue  
**City:** Hermosa Beach  
**State:** CA  
**Zip:** 90254

**Telephone # (daytime):**

**Email Address:** angatbeach@hotmail.com

**Organization:**

**Comments:**  
If this desalination plant goes forward it will RUIN life as we know and love it in El Porto! As someone who grew up in Porto this is absolutely infuriating. That surf spot, Beach & our community deserves to be protected from this catastrophe. I can only hope this insane idea gets squashed!

|  
| SBE-1  
|

**From:** West Basin  
**Sent:** Wednesday, April 11, 2018 5:01 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Matthew Schroeder

**Mailing Address:** 117 12th St.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** matt.schroeder@unrulygroup.com

**Organization:**

**Comments:**

The proposed locations for the desalination facility are too close to a residential area - the El Porto section in north Manhattan Beach. The expected impact on residents, such as noise and air pollution is of great concern. Construction of a project of this size would create a major traffic problem affecting one of the major north-south gateways into and out of Manhattan Beach.

SCHR-1



**Comment Letter SCHULTZ**

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/28/2018	Janice Schultz	3814 Ocean Dr	Manhattan Beach	CA	90266	I don't support desalination as an economical or environmentally viable means of producing fresh water . However if this goes forward, then at least place it near the jetty . There are no homes nearby that would be bothered by the attendant noise and visual blight.

SCHU-1

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 2:48 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Juli Schulz

**Mailing Address:** 2408 Ocean Ave  
**City:** Venice  
**State:** CA  
**Zip:** 90291

**Telephone # (daytime):** 310-351-1627

**Email Address:** julischulz@me.com

**Organization:**

**Comments:**

This is not a good plan, it will have long-lasting negative effects on our coastline and marine environment. West Basin should be spending time on how do we treat our wastewater, instead of using a method that is energy and water intensive and will wreak havoc on our local oceans and beaches.

SCHUJ-1

**From:** vic  
**Sent:** Wednesday, March 28, 2018 9:25 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** vic

**Mailing Address:** 3814 ocean dr  
**City:** MB  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** vicschultz@otmail.com

**Organization:**

**Comments:**  
DON" T DO IT!!

| SCHUV-1

**From:** West Basin  
**Sent:** Wednesday, April 11, 2018 7:28 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Gary Senser

**Mailing Address:** 317 30th Place  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310.383.2779

**Email Address:** senser@gmail.com

**Organization:**

**Comments:**

The south location will adversely affect Manhattan Beach, visually and audibly. I would vote for the northern-most location.

SEN-1

**From:** West Basin  
**Sent:** Friday, April 6, 2018 5:28 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Elias Shamos

**Mailing Address:** 307 El Porto street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** Elias.shamos@gmail.com

**Organization:** Resident

**Comments:**

IF We ha e to have this, Please place on "North Site".....loud operation sounds and visual esthetic of our neighborhood still matter to us.

SHA-1

**Justin Sumi**

---

**From:** Noemi Luna  
**Sent:** Wednesday, March 28, 2018 8:45 AM  
**To:** Justin Sumi  
**Cc:** Jennifer Lao  
**Subject:** FW: West Basin Desal Site Comments

Justin,  
Below is a comment to add to the WB OWD Comment 'Smartsheet'.

--

**Noemi Luna**  
Project Manager



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**From:** Bob Sievers [mailto:tradesurf@mac.com]  
**Sent:** Tuesday, March 27, 2018 6:41 PM  
**To:** Noemi Luna <nluna@mbimedia.com>  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Bob Sievers

**Mailing Address:** 121 Moonstone Street  
City: Manhattan Beach  
State: CA  
Zip: 90266

**Telephone # (daytime):** 3109777929

**Email Address:** [tradesurf@mac.com](mailto:tradesurf@mac.com)

**Organization:** none

**Comments:**

You are proposing to put a costly, environmentally unfriendly plant right on top of my neighborhood. We know the huge contacts are what is driving this thing. The fact that the south site is even being considered is shocking to all of us in El Porto. While the project leaves a serious environmental footprint, if are going to tolerate anything at all, it will be at the North site and will utilize the 5 mile pipe. We surf at this beach and do not want brine and algae in the ocean you should

┆  
┆  
┆ SIE-1  
┆  
┆  
┆ ↓

**Comment Letter SIEVERSB**

be concerned with protecting. We will speak and speak loudly. Of course you want your shiny new offices here by the beach rather than their present location. We are on to you and will all stand together to stop this at all costs. NOT HERE

↑  
SIE-1

**From:** Bob Sievers  
**Sent:** Wednesday, March 28, 2018 4:05 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Bob Sievers

**Mailing Address:** 121  
**City:** MAnhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3109777929

**Email Address:** TRADESURF@MAC.COM

**Organization:**

**Comments:**

OUR ENTIRE COMMUNITY OF EL PORTO WILL NOT STAND FOR A  
PLANT AT THE SOUTH SITE

┌  
SIE2-1  
└





# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Nate Sievers

Mailing Address 121 Monstone St. Manhattan Beach CA 90266  
Street City State Zip

Telephone # (daytime) 310-977-7929

E-mail Address tradesurf@aol.com

Organization/Affiliation EL Porto homeowner

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

~~A~~ ~~is~~: Does West Basin plan to compensate the property owners for the potential 50-100mm property losses imposed upon them by the proposed South Site.

SIEN-1

Is there a reserve set aside for legal expenses when the hundred of lawsuits begin flooding in?

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To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Marilyn Slominski 90260

Mailing Address 121 38<sup>th</sup> Place Manhattan Beach CA

Telephone # (daytime) 310 877-4792

E-mail Address marilynslominski@gmail.com

Organization/Affiliation resident + landlord

Please provide comments in the section below and leave in comment box or place in mail by Monday, June 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

I am very concerned about the noise and air quality issue that will effect the El Porto area SLO-1

-I am also concerned about the impact on my rental property in terms of income I depend upon for my retirement and now this will lessen the desirability of the property SLO-2

-I am very concerned that this process will take @ 5 years and now this will impact noise, air quality, traffic congestion and quality of life. SLO-3

To mail: fold, staple or tape together, and include a stamp.

**From:** West Basin  
**Sent:** Tuesday, April 10, 2018 3:51 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Smithk601

**Mailing Address:** USA  
**City:** Oakland  
**State:** WY  
**Zip:** 22042

**Telephone # (daytime):**

**Email Address:** smithk331@gmail.com

**Organization:**

**Comments:**

Great website! I am loving it!! Will be back later to read some more. I am taking your feeds also eefadgbdeebdgbg

SMI-1

**Justin Sumi**

---

**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Thursday, April 26, 2018 1:20 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Jane Soderberg

**Mailing Address:** 2508 Alma Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** jfsoderberg@comcast.net

**Organization:** Homeowner in North Manhattan Beach/Sand Section

**Comments:**

I am opposed to the construction of a desalination plant on the border of North Manhattan Beach (your proposed SOUTH location) at approximately 45th Street. This location is TOO CLOSE to the residents of Manhattan Beach, I REPEAT THIS SITE IS TOO CLOSE to Manhattan Beach, a vibrant, affluent, lovely seaside community. Currently it is bad enough that Chevron is in our backyard although shielded from our view, any and all "situations" there are easily smelled, seen and effect the citizens of Manhattan Beach, whether planned or unplanned emergencies like explosions, fires, etc. Chevron removed two large above ground fuel tanks at this location in 2013 and I do not want this eyesore replaced with another, nor want the installation of another type of "utility" whose existence, day to day running and emergency "situations" will very much effect the residents of Manhattan Beach. I have read about de-salination plants in other locations and how they are not effective/used. It would be an expensive experiment that would make LA city/county officeholders feel good and give a boost to their resume without resulting in a true solution to our water problems.

SOD-1

**From:** West Basin  
**Sent:** Tuesday, April 10, 2018 6:28 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Aaron spiewak

**Mailing Address:** 3528 Maple Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** aaspiewak@yahoo.com

**Organization:**

**Comments:**

The desalination plant will be a blight, no matter its location. Furthermore, it is not necessary. Did you know that the Hyperion Treatment plant has the ability to recycle water? It is only operating at approximately 20% capacity. It could increase operational capacity and solve the alleged water shortage problem. USING A SYSTEM THAT IS ALREADY IN PLACE.

┌  
SPI-1  
└



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Christy Stanich

Mailing Address 123 El Porto MB GA 90264  
Street City State Zip

Telephone # (daytime) 805-241-5161

E-mail Address Lakod91@verizon.net

Organization/Affiliation Resident

Please provide comments in the section below and leave in comment box or place in mail by Monday, June 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

The environmental component of this project is not only incomplete but an insult to residents, ocean recreation users and sea life. The numbers being recited are incorrect regarding bin-plums and volume of the concentrated salt content discharged into the ocean. Guessing and using old and unequal studies should not be allowed. Lobbying for water policies that allow blended water to be used for city consumption is a more sensitive environmental and economical approach.

STAC-1

To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) JIM Stanish

Mailing Address 2855 Allyson Ct. Thousand Oaks CA 91362  
Street City State Zip

Telephone # (daytime) 310 - 365 - 3036

E-mail Address JStanish25@gmail.com

Organization/Affiliation El Peato homeowner

Please provide comments in the section below and leave in comment box or place in mail by Monday, June 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project 5/14/18  
(please print and use additional sheets if necessary):

- ① As an El Peato homeowner, the aesthetics and attributes of the ES65 North Side are not priority. At the North Site, the Desalination Facility would replace existing infrastructure and would be less visible and intrusive to El Peato residents. STAJ-1
- ② As a condition to developing the North Site with the Desalination Facility, it is recommended that landscaped public open space be located on the ES65 South Site. This will enhance and beautify the area, providing a benefit to the El Peato residents and perhaps providing some offset to the noise, traffic, & disruption generated particularly during the construction phase. STAJ-2

To mail: fold, staple or tape together, and include a stamp.

Council Card Jim Stanich 5/17/18

3) At the public meeting, West Basin stated that the Desalination Facility will provide water for 60,000 households. This supply quantity does not appear to warrant the cost to develop the Facility and the potential negative impacts to the surrounding ecosystems. Greater gain in water availability can be made through more aggressive water conservation efforts in particular with landscape irrigation. Perhaps if a significant portion of the Project costs were designated for landscaping changes and conservation efforts (including financial incentives to the water users), the decline in water usage would exceed the additional supply created by the Project. It does not appear that the EIR ~~fully~~ evaluates enhanced conservation alternatives

STAJ-3

4)

Building and operating a desalination facility ~~is~~ is not a core business competency of West Basin. The magnitude of this Project may be beyond its capacity.

STAJ-4



Slide

5/14/18

123 El Porto St  
Manhattan Beach, CA



**From:** West Basin  
**Sent:** Thursday, April 12, 2018 4:40 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Travis Stansbury

**Mailing Address:** 2912 Pacific Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** [travis@es94.com](mailto:travis@es94.com)

**Organization:**

**Comments:**

We do not need this in Santa Monica Bay, at all. Simply use the money on existing facilities to increase reclamation, promote conservation, and if necessary increase prices to further reduce consumption. More local traffic and noise are not needed.

STAN-1

**From:** West Basin  
**Sent:** Thursday, April 12, 2018 3:07 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Nic

**Mailing Address:** 113 28th Pl  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):**

**Email Address:** nicstauber@gmail.com

**Organization:**

**Comments:**

I am firmly AGAINST the south site and the desalination plant in the South Bay area.

STAU-1

## Comment Letter STAVROPOLOUS

Date Submitted	Name	Address	City	State	Zip Code	Comments
3/28/2018	William Stavropoulos	680 18th Street	Manhattan Beach	CA	90266	MY FAMILY (AND JUST ABOUT EVERYONE I KNOW IN LA) IS VERY STRONGLY OPPOSED TO THE PLANT, ESPECIALLY THE SOUTH SITE.

STAV-1

**From:** Noemi Luna  
**Sent:** Monday, May 7, 2018 2:39 PM  
**To:** Justin Sumi  
**Subject:** Fw: West Basin Desal Site Comments - Ed Tellis

---

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

WB Comment to log.

--

Noemi Luna  
Project Manager



Covina . Los Angeles . Orange County . San Jose California | (800) 700-1999 [www.mbimedia.com](http://www.mbimedia.com)

Corporate Headquarters Phone: (626) 967-1510 Fax: (626) 967-1718

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Please consider the environment before printing this email.

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Monday, May 7, 2018 2:36 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Ed Tellis

**Mailing Address:** 5636 Heatherdale Dr  
**City:** Los Angeles  
**State:** CA  
**Zip:** 90043

**Telephone # (daytime):** 310-200-7185

**Email Address:** tellislv@yahoo.com

**Organization:**

**Comments:**

We should be doing more to capture storm runoff water, create spaces so more rain water enters the water table, and use more rain water which all at the same time benefits the environment. Lets do better with the water we have before creating an expensive desalinization project that will add to existing environmental issues related to not being good stewards of the water we have now.

TEL-1

**From:** Ralph C. Tisdale  
**Sent:** Wednesday, March 28, 2018 10:10 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Ralph C. Tisdale

**Mailing Address:** 2633 Via Rivera  
**City:** Palos Verdes Estates  
**State:** CA  
**Zip:** 90274

**Telephone # (daytime):** (310) 214 - 8601

**Email Address:** Ralph.tisdale@voyagercourt.com

**Organization:** Self

**Comments:**

I own property on 45th St and Gull St and am totally opposed to the desal plant being built on the south side as it would lower my property values and rental rates. I see no reason to build the plant next to a residential area when it could be placed in a more fitting industrial area. If it is built on the south side I would expect financial compensation.

TIS-1



# West Basin Municipal Water District Ocean Water Desalination Project

Comment Letter TISDALE2

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) RALPH TISDALE

Mailing Address P.O. BOX 246 MANHATTAN BEACH, CA 90266  
Street City State Zip

Telephone # (daytime) (310) 214-8601

E-mail Address RALPH.TISDALE@VOYAGEREALTY.COM

Organization/Affiliation PROPERTY OWNER - MANHATTAN BEACH

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

See ATTACHED SHEET  
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To mail: fold, staple or tape together, and include a stamp.

I am a property owner in North Manhattan Beach (El Porto). I would not object to constructing the desalination facility at the proposed North Site. If the plant were to be placed at the South Site I would be opposed for the following reasons:

TIS2-1

**Construction Noise:** The site is across the street from densely populated area and the four years needed to complete the project will cause an unavoidable impact on the residents.

TIS2-2

**Operating Noise:** Again the site is very close to large numbers of people and mitigating noise and pump vibrations is going to be almost impossible.

**Construction traffic:** During construction Vista Del Mar Ave. will be reduced to one lane each way. If this occurs at the traffic light at 45<sup>th</sup> Street, only one lane will get through on each 'green' doubling the south bound traffic wait time. Building further north will allow two south bound lanes to cross the intersection.

TIS2-3

**Air Pollution:** Dust and other contaminants generated by construction will impact large numbers of people living in El Porto.

TIS2-4

**Aesthetics:** At the North Site replacing a Steam Generating Plant with a Desalination Facility will have no effect on anyone. At the South Site placing an industrial facility across the street from a residential area is not good land use planning by any criteria.

TIS2-5

Thank you for your interest.



**From:** West Basin  
**Sent:** Friday, May 25, 2018 2:18 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Gregory Ugarte

**Mailing Address:** 315 Gull Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 8053313509

**Email Address:** gregugarte@gmail.com

**Organization:**

**Comments:**

I am opposed to the project for several reasons. - cost of gallon of water compared to imported or storm recovered. - living in the El Porto neighborhood, I know that the proposed 3 years of construction will create a situation of unbearable traffic next to the site. -the energy consumption for the reverse osmosis process is enormous - normal life for the people in the area as far as the relationship with the beach and ocean will be altered. - property values in the immediate area will be negatively affected. I oppose the project in either location and that instead the funds be utilized to further fund other storm water recovery programs. Nonetheless I appreciate this EIR study in its depth and objective scope. Gregory Ugarte

UGA-1

## Comment Letter UNGOCO

Date Submitted	Name	Address	City	State	Zip Code	Comments
4/2/2018	Joseph Ungoco	201 Kelp Street	Manhattan Beach	CA	90266	<p>As a former public relations professional in New York, I have from the beginning been concerned with the methodology employed in noticing the public for community input on this proposed project. I believe the sampling model is seriously flawed. I live only 4 blocks from the proposed southern site and was not invited to the community meeting meant to address the concerns of neighbors and interested parties. I attended as a stand in for a friend and neighbor who lives on 45th st. I was the only person in attendance at the meeting and was given the full dog and pony. The format of the meeting was not structured to solicit my input but rather to 'educate me' regarding decisions that were presented as already having been made. If West Basin - and its Directors - are truly committed to soliciting public input, they should be more transparent and make more of an effort to reach out to those likely to be affected by their decisions. I am strongly opposed to the proposed southern site and I feel that many of my immediate neighbors would also be - had they been properly notified about this. Our neighborhood already is under siege from our neighbor to the north. Right as we in MB are discussing the relative merits of undergrounding our power lines, we have been treated to new high tension lines within 'swinging distance' of our homes. This proposed location for the desalinization plant seems like just the latest in a never-ending series of assaults on our neighborhood with little concern for those of us who live there.</p>

UNG-1

**From:** West Basin  
**Sent:** Tuesday, April 24, 2018 10:01 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Debra Van Neas

**Mailing Address:** 432 34th Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310-545-7242

**Email Address:** debbievanness@yahoo.com

**Organization:**

**Comments:**

I am writing to state my unequivocal opposition to the proposed desalination plant in El Porto. I don't believe this is the best solution for our water problem. The amount of energy it will take along with the negative environmental impact is too great a cost without trying other solutions first. Heal the Bay has proposed many of those solutions. Plus this part of the beach is already filled with power plants, water treatment, oil tanks. It must stop! We live here! This is not the place for it even if I believed in the plant as a solution.... which I do not. I am in strong opposition to this plant here in the South Bay.

VAN-1

## Comment Letter VICKERS

**From:** Norman Vickers  
**To:** [West Basin Desal EIR](#)  
**Subject:** Ocean Water Desalination project Public input  
**Date:** Thursday, April 12, 2018 12:43:40 PM

---

Hi All,

Just a second for my 2 cents... I am quite concerned that the quality of the water will be degraded with the introduction of Ocean Water Desalination. I have always been under the impression that Reverse Osmosis water is not as healthy, Please send a response.

VIC-1

Norman Vickers  
National Technical Services  
Personal, Professional Computer and Network Services  
Phone: 310 679-4832  
Fax: 310 263-0667  
Email: [norman@NTSTOO.com](mailto:norman@NTSTOO.com)

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**From:** West Basin  
**Sent:** Tuesday, April 24, 2018 12:16 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Mark Wald

**Mailing Address:** 3515 Vista Dr  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3106256262

**Email Address:** mbwald@gmail.com

**Organization:**

**Comments:**

I am opposed to the construction of desalinization plants in or near Manhattan Beach, CA, especially the proposed lotion near 45th street. Aside from the noise that would negatively impact the adjoining residential neighborhood, the negative environmental impact to the coastal ecosystem there is intolerable. There must be thousands of better suited sites along the southern CA coastline for this type of project and operation. Besides, desalinization is very expensive and should ONLY be considered after all other viable options for sourcing potable water have been exhausted. CA has 1/2 dozen other viable options to try first that cost considerable less, such as capturing rain water or removing the concrete from the LA River Basin so that the water can be absorbed by the earth opposed to evaporating into the air. Please don't let corporate interests and egos influence the decision to build a desalinization plant in our otherwise beautiful beach community.

WAL-1

**From:** Noemi Luna  
**Sent:** Monday, May 7, 2018 10:04 AM  
**To:** Justin Sumi  
**Subject:** Fwd: West Basin Desal Site Comments - Kyle Weinsheim

---

WB Comment.

Noemi Luna

Project Manager

MBI / 626-967-1510

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Saturday, May 5, 2018 11:49:28 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** Kyle Weinsheim

**Mailing Address:** 124 Gull St.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310-546-5224

**Email Address:** KyleWeinsheim@Yahoo.com

**Organization:**

**Comments:**

I am opposed to the water desal facility being constructed on the Southerly end of the El Segundo parcel bordering 45th St. in Manhattan Beach. As a long-time El Porto homeowner and a decades long taxpayer, I know for certain that property values will drop if the desal plant is built on the Southerly border. As a result, property tax

↓  
WEI-1  
17-202

**Comment Letter WEINSHEIM**

assessments will drop as a result. That means less income for the City of Manhattan Beach. In addition, it is highly likely quality of living in El Porto will be negatively impacted by increased noise and pungent saline odor levels. It appears that the Northerly proposed site has sufficient room to accommodate the proposed desal plant without as much impact to local residents as placing it at the Southerly site. While I am not in favor of either site without further environmental impact research being conducted and shared with the public, I am willing to review further details with an open mind regarding the Northerly proposed site.



**Comment Letter WENGLIKOWSKI**

**From:** West Basin  
**Sent:** Wednesday, April 25, 2018 9:17 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Laura Wenglikowski

**Mailing Address:** 213 Seaview St.  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3102928066

**Email Address:** lauraweng@verizon.net

**Organization:** Concerned resident

**Comments:**

Do NOT go through with this!! How can, in our supposedly "environmentally aware" of California, can this idea of a desalination plant even be considered?!? Such a huge impact to our ocean, wildlife, residents...this MUST NOT go forward!!!

WEN-1



**From:** West Basin  
**Sent:** Monday, April 9, 2018 10:45 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** Kelly Wickemeyer

**Mailing Address:** 117 42nd Street  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 310490-2666

**Email Address:** kelly@object8.com

**Organization:**

**Comments:**

We are strongly opposed to a desalination plant so close to our homes. We ask that you reconsider the location to a less populated area either north of El Segundo, or another location in a more remote area that will not affect property values, ocean wellness and overall visual impairment of a beautiful community. Thank you.

WIC-1

**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Sunday, June 24, 2018 2:48 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** John Wilcox

**Mailing Address:** 462 Rosecrans Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3103865646

**Email Address:** johnwilcoxrealty@gmail.com

**Organization:** The Wilcox Family

**Comments:**

My family (myself, my wife, and 2 daughters) are adamantly opposed to the proposed Desal project for the following reasons: Desalination is the most energy-intensive and expensive water supply option in California Table 5.2-9 NOX 5X SCAQMD Threshold in 2022 - 519lbs vs 100lbs a day Table 5.7-4 Close to a doubling of GHG compared to current imported water emissions Table 5.12.6 - Noise - (construction related) Even after proposed mitigation measures, project construction would result in significant unavoidable noise impacts.

WILC-1

(Operational Impacts) - Operation of the facility would generate noise from treatment equipment as well as increased human activity on the property involved with the operating and maintaining of the facility. Table 7-2 the data is flawed and vague - Increased conservation, storm water capture, and recycling were all rejected from further analysis but would eliminate the need for the costly desal plant/water during times of drought. Cape Town has a 13 gal per person limit per day. Avg. LA usage per person is 60 gal per day. We live in a desert climate and need to get rid of the lawns the use approximately 40% of residential water. The L.A. County Department of Public Works estimates that from Jan. 18-31 2017 alone, roughly 25 billion gallons of stormwater "or about 77,000 acre-feet" drained into the ocean from the Los Angeles River watershed.

WILC-2

(The entire city of L.A. uses about 550,000 acre-feet of water a year). West Basin, you already recycle water and can increase capacity. Lastly, I am opposed for all of the reasons cited in this article:

WILC-3

<https://www.smarterwaterla.org/prolific-costs-of-poposed-south-bay-ocean-desalination-plant-exposed/> and this article: <https://www.surfrider.org/coastal-blog/entry/water-conservation-a-better-choice-than-desalination> Thank you for not building the desal plant and not jeopardizing the health our community and my 2 young daughters with unhealthful noise, GHG and NOX emissions. Thank you for not building the desal plant thereby avoiding the significant and unnecessary impacts to marine life and water quality. Look no further than Santa Barbara to see why this would be not only a bad ethical decision, but a bad financial decision for WBMWD as well! Kind regards, John Wilcox

WILC-4

## Comment Letter WILLIAMS

Date Submitted	Name	Address	City	State	Zip Code	Comments	
3/30/2018	TOM WILLIAMS	4117 BARRET ROAD	LosAngeles	CA	90032-1712	<p>The EIR states that economics, finance, price, costs are part of the Project objectives but without any such info. Please provide immediately a thorough Economic assessment as the Project Objectives and various points in the text and appendices. Please include pricing and profitability for rate payers and ROI for each major service area (&gt;10) and regional units..</p> <p>1-2/2 1.2 Project Objectives            West Basin - goal is to guarantee future water supply reliability for service area customers by adding....            The Project objectives of West Basin - proposed Ocean Water Desalination Project are to:</p> <ul style="list-style-type: none"> <li>- Diversify West Basin - water source portfolio to increase reliability...while reducing reliance on imported water....</li> <li>- Improve West Basin - local control of future water COSTS and long-term PRICE stability.</li> <li>- Develop a potable water supply that is ECONOMICALLY viable...</li> </ul>	WIL-1

---

**From:** Tom Williams <ctwilliams2012@yahoo.com>  
**Sent:** Saturday, March 31, 2018 5:49 PM  
**To:** West Basin Desal EIR  
**Subject:** DeSal+Conveyance DEIR

Thanks for the FedEx...NOA for 2015081087

Will be ending more comments

Many comments regarding EJ...for "conveyance system" in Local and Regional contexts.

OBTW

Coming to evening meeting

Did my first EIR in 1972-73...done >400 EIRs/EISs/EAs for URS + Parsons Corp and then lots of related stuff for Dubai World...one project was oil spill cleanup for Chevron in Sta Monica

Bay, another for Port LA-Midland Oil Pipeline

Retired 2012...but still working

So many issues for both offshore facilities and the conveyance system...delivery pressure and sourcing/quality.

All references in text and appendices must be available to the public...they ain't.

"Withdraw- Revise-Recirculate"

WIL2-1

WIL2-2

Life member of Sierra Club and Audubon

Dr. Tom Williams  
323-528-9682

### Comment Letter WILLIAMS3

Date Submitted	Name	Address	City	State	Zip Code	Comments
4/1/2018	TOM WILLIAMS	4117 BARRET ROAD	LosAngeles	CA	90032-1712	<p>Cmts: Reports cited, and many others, are not available to the public in appendices or online. Please provide a consistent and solitary form of referencing and review all references and provide.all for public review through online web page or appendices.</p> <p>Example:                      5.4-52/2 - 55 5.4.7 Sources Cited                      BCR Consulting, LLC, 2016. Cultural Resources Assessment: West Basin Ocean Water Desalination Project, March 18, 2016.                      Bean, Lowell John, and Charles R. Smith. Gabrielino, 1978. In California, edited by Robert F. Heizer, pp. 538-549. Handbook of North American Indians, Vol. 8, William C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.                      Bickel, Polly Mcw, 1978. Sea Levels Along the California Coast: Anthropological Implications. In The Journal of California Anthropology, 5(1):6-20, 1978.</p>

WIL3-1



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Dr Tom Williams

Mailing Address 417 Bonnett Rd LA CA 90032-1712  
Street City State Zip

Telephone # (daytime) 323-528-9682

E-mail Address ctwilliams2012@yahoo.com

Organization/Affiliation CCSC

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

The DEIR is incomplete and inadequate due to the absence of setting and assessment for the service areas during normal and abnormal conditions which relate to sources, quality, pressures and flows. These deficiencies are further heightened by their EIR's lack of implication for service near the desal plant as that in central & eastern portions of WB service areas.

WIL4-1

To mail: fold, staple or tape together, and include a stamp.

**Comment Letter WILLIAMS5**  
PUBLIC COMMENTS

West Basin Desalination DEIR SCH # 2015081087

**DATE:** June 25, 2018  
**TO:** West Basin Municipal Water District 17140 So. Avalon Blvd., Carson, CA 90746  
**Attn:** Zita Yu, Ph.D., P.E., Project Manager  
desalEIR@westbasin.org  
**cc:** Ca Amer Wtr.Co. Ca Wtr Service Golden State Wtr. Co.  
Smarter Water L.A., L.A. Waterkeeper, Heal the Bay,  
Surfrider Foundation, Environmental Water Caucus  
El Segundo Inglewood Lomita Manhattan Beach  
County Water Works. Distr. 29  
Water Replenishment Distr.  
**FROM:** Dr. Tom Williams, Snr. Techn. advisor,  
Citizens Coalition for A Safe Community, ctwilliams2012@yahoo.com 323-528-9682  
4117 Barrett Rd., Los Angeles, Ca 90032-1712  
**SUBJECT:** WBMWD Ocean Water Desalination Project  
Draft Environmental Impact Report (DEIR; SCH # 2015081087)  
**RE:** Comments on and Requests for DEIR

Thanks you for the opportunities for commenting on the DEIR, attending the two public meetings, and other aspects of the CEQA process.

**Overall Comments/Requests** can be summarized as follows:

- Current DEIR is incomplete and inadequate;
- Withdraw the entire document;
- Make massive revisions, quantifications, and upgradings-
  - Provide publicly accessible references;
  - Provide referencing/citations singularly and consistently formatted with direct access to cited webpage;
  - Provide obscure references as appendices or on a WB web-page;
  - Provide consistent units of measures;
  - Provide a draft Mitigation/Monitoring/Reporting Program.
- Revise for a Programmatic EIR rather than a specific Project EIR with two separate projects.
- Once REVISED, recirculate for public/agency comments.

WIL5-1

**General Sector Comments:**

Alternatives do not include increased IPR 2018-2023 with Upgrading to state regulated DPR with groundwater storage and sea water barrier:

- Alternative - DPR/Hyprn. Terminal Isld.
  - 2018-2023 Water Factory 2023 IPR > GW barriers + storage...GW wells for pressure augmentation
  - 2023-2043+ Water Factory 2043 DPR + GW barriers + storages + flow/pressure/quality
- Hyperion > 20-60MGD > WB Trmt Fac. > Discharge reject flow thru Outfall > Trtd Water >

WIL5-2

Local and Regional Project elements are not well associated and effects not distinguished or integrated.

WIL5-3

Piped Water Quality - current and inland sources vs desal are poorly described and not quantified:

- No Qual. - Pressure - Flows
- Who gets the better / lesser quality water Now Later
- Service areas with changes of sources - Env.Justice for service areas

WIL5-4

CPUC/Federal - Env.Justice is not well described nor quantified for service area deliveries and has total disregard for renters, owners, and owner-occupants.

WIL5-5

References/Citations Not publicly Accessible/Available 5 days is not publicly accessible.

WIL5-6

Available aerial photos were not used for historic resources and potential haz.matts.

WIL5-7

Citizn.Coaltn. for A Safe Community

June 25, 2018

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**Comment Letter WILLIAMS5**

**PUBLIC COMMENTS**

West Basin Desalination DEIR SCH # 2015081087

Mitigation - Conservation were not integrated		WIL5-8
LID – Structure rain barrels, GW recharge, irrigation and LID 10bbl = 400+gal/1000sf roof		
Dwelling Greywater Dwelling Water Efficiencies		
Project Description - has very inadequate and incomplete descriptions, e.g., process flow diagram for night/daytime operations and nothing about nighttime excess production storage;		WIL5-9
Service Areas – Pumping, conveyance/transmission, and distribution/delivery system model for flow/pressure quality;		
Operations – 24/7 Production what to do with nighttime flows, or reduced production – costs/maintenance Who pays/Who benefits;		
Environmental Justice – Service Areas Who Pays / Who Benefits Renters / Owners		WIL5-10
Federal Jurisdiction - NEPA		
Local and regional Service Area Owner/Occupied vs Renters		
Growth Inducement - More/Better Water - more reliable/lower costs for whom.		WIL5-11
Economics – No economic model although economics, prices, and costs used in the Project Objectives		WIL5-12
Biology - Marine Life – Focused entirely on >3mm not total biota and food chains		WIL5-13
No survey/literature review for micro-biota – bio/phyto/zoo plankton/nekton/benthon		
Increased mega-biota feeding at Discharge...soup/consumme		
Cultural Resources		WIL5-14
Historic Resources – Site and Pipelines – Foundations, Privies, Dumps/Pits		
Historic Aerial Photos for Hazardous Uses and Cultural/Historic Uses & Resources		
Archeological Resources		
High potential for remains/villages from >-100ft depth to shore line and east		WIL5-15
Hazards		
Historic Aerial Photos for Hazardous Uses and Cultural/Historic Uses & Resources		
Chevron Marine Oil Spills and Offshore Oil Seeps		WIL5-16
Natural offshore oil seeps = Brea = faults to surface		
Soils & Geology – Infiltration Groundwater adjudicated basin		WIL5-17
Water Quality - Chevron Oil Spill		WIL5-18
Seismicity – offshore oil seeps = Brea = faults to surface		
No use of SCEqCntr data base		
Seismicity-Seiche/Tsunami		WIL5-19
Qualifications of Dr. Tom Williams, retired		
PhD geol./zool.		
Professional URS Parsons Pasadena Dubai World - 12 yr		
Water Experience		
Monterey Bay Reclamation/Water & Water Factory 21		
Oahu Power Plant intake/discharge		
StaMonica Bay/El Segundo/Chevron Oil Spill		
Latakia Syria Songkhla Thailand ocean discharges		
HongKong Black Point Intake/Outfall		
Cairo City water supply		
Soquel Creek water supply		
Upper Owens Valley groundwater resources and supply		
Black Butte Reservoir and downstream uses.		
Morro Bay - Oil spill containment and remediation		
Mare Island - Dredged Disposal and Reclamation		
Various Landfills		
Water Fix Tunnels and Seismic Hazards		



**Specific Comments**

**TBR = To Be Revised/Updated by 06/30/18**

**1-1/2 = Section-Page/Paragraph, underlined copy from teext for highlighting for comments. *Commens***

**NOA** Project Description: West Basin is investigating the feasibility...desalination facility at two potential sites within the existing El Segundo Generating Station....produce 20 million gallons...water (Local Project)...future expansion...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. ...Basin's only water supplies are imported water .... For the Regional Project, WB 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....would further reduce dependence on imported water within...service area and improve overall regional supply reliability.

**Present tense for "is investigating", "the feasibility", and "two potential sites" would suggest a dependency and conditionality (conceptual plan) not suitable for an EIR (preliminary design). Remove conditionality and dependency and present as an established preliminary design and funding for both projects.**

WIL5-20

**Separation of Local and Regional Projects suggest that they are independent while the EIR is for both projects. Revise the current DEIR to be a programmatic EIR with two or more components to be construction over the next 12 years.**

WIL5-21

**Use of MGD and later AF/Y is confusing too general public. Convert all uses of quantitative units to MGD and avoid any alternative units.**

WIL5-22

**The Basin's supply must include local agencies' groundwater supplies plus treated effluent (from various sources). Revise.**

WIL5-23

**"Local Partners" and "would look" are so generalized as to be meaningless and thereby renders the "Regional Project" to be imaginary and not suitable for consideration or assessments.**

**Define/quantify regional scale water demands at Local and Regional levels/areas. their dependence, and reliability at WB-buyers, "partner", Local, and "regional" service areas.**

WIL5-24

The Project would include...of ocean water intake and concentrate (brine) discharge infrastructure, an onshore desalinated water treatment facility, and a product water conveyance system....treatment process would include pre-treatment filtration, reverse osmosis membranes, and post treatment conditioning....discharge system...blend of concentrated ocean water...to the ocean through a diffuser system for dispersion....water conveyance system would deliver drinking water to the local drinking water distribution system. Appurtenant facilities,...as part of the Project.

**No separation of facilities for local and regional systems; provide separated and common facility**

WIL5-25

**Provide quantified "Blend" of process/natural waters**

WIL5-26

**Provide "conveyance system" map with current and future demands and any deficiencies without the Local and Regional Projects' "product waters".**

WIL5-27

**Differentiate between "conveyance" and "distribution" systems.**

WIL5-28

**Product water includes more than "drinking water"; provide clarified/consistent usages.**

**Define "appurtenant facilities".**

WIL5-29

**The entire Marine Biology is misleading and incomplete/inadequate which focuses predominately on macro-biota (>1mm diameter) and disregards most if not all of the micro-biota, <1mm. Such have been discussed/studied by others:**

**Micro-/Nanno-Biota, <1mm.: plank-, nek-, benthons; diatoms, foraminifera, ostracods, etc.**

Reiter, Martin. 1959. Seasonal variations in intertidal foraminifera of Santa Monica Bay, California. Journal of Paleontology 33: 606-630.

WIL5-30

Foraminiferal Ecology of Santa Monica Bay, California Emil R. Zalesny *Micropaleontology* Vol. 5, No. 1 (Jan., 1959), p: 101-126 The Micropaleontology Project., Inc. DOI: 10.2307/1484158.

URL: <http://www.jstor.org/stable/1484158>

file:///C:/Users/tmyl/Downloads/Hunger\_Arthur\_A\_1966.pdf .

**Environmental Justice**

**DEIR does not include any discussions pertaining to Environmental Justice within the Conveyance/Distribution/Service areas.**

WIL5-31



1-1/2 The Local Project would provide approximately 11 percent of West Basin's water demand, relieving pressure on the heavily constrained supply of imported water available to West Basin. The new water source would increase the overall water supply reliability, drought resiliency, local control, and water security in the region. **The Local Project would be used to serve communities within West Basin's service area.** The **Regional Project**...in partnership with other **local and regional partners**, such as Metropolitan Water District of Southern California (MWD), to **meet the demands and increase water supply reliability for a larger portion of the Southern California community.** This Project Description describes the Local Project...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, ...cannot be analyzed at the level of detail required for project-level analysis**....are analyzed at a "programmatic level," pursuant to CEQA Guidelines Section 15168.

**Define/list/quantify "some...details", "communities", "service areas", "local and regional partners", "larger portion of....community", reliability, "some...details...cannot analyzed".**  
**Provide comparison of programmatic vs project level analyses required for this "project" marine-sourcing, treatment, and distribution elements.**  
**As a Project DEIR details must be described an assessed subject to later changes and supplemental CEQA compliance(s). Revise Project EIR to a Programmatic EIR.**

WIL5-32  
WIL5-33  
WIL5-34

1-2/5 The ESGS property is located in the **South Bay region of Los Angeles County** within West Basin's service area, **just** south of Los Angeles International Airport (LAX).  
**Define/quantify "just", e.g., 1, 2, or 5 miles south.**

WIL5-35

**1-2/2 1.2 Project Objectives**

West Basin's goal is to **guarantee** future water supply reliability for **service area customers** by adding....  
**Define and quantify "guarantee" and service areas, and customers.**

WIL5-36

The Project objectives of...Project are to:

• Diversify...water source portfolio to **increase reliability**...near **[0-5]** and intermediate term (5–15 years) and the long term (15–30 years) while **reducing reliance** on imported water....

• Improve...**local control** of future **water COSTS** and **long-term PRICE stability**.

• Develop a **potable** water supply that is **ECONOMICALLY viable**...

**7-3/2 7.1.2 Project Objectives Same as 1.2**

The Project objectives of West Basin's proposed Ocean Water Desalination Project...Section 3 **[1.2 & 3.3]** are to:

- Diversify...Basin's water **source portfolio** to increase reliability...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.

**3-3/2** The Project objectives of West Basin's proposed Ocean Water Desalination Project are to:

**Define and quantify: future, long-term, costs, price, economically, local control, stability, viable, potable. Define and quantify temporal periods (near, short, and long terms) related Local and Regional Projects. Define and quantify "increase, reliability, reliance, stability, reducing, local, control, future and long-term, costs, and price.**

WIL5-37

**Lack of Consideration/objectives for offshore facilities and conveyance system; provide objectives specific to marine and service area conditions and parameters.**

WIL5-38

**The EIR states that economics, finance, price, costs are part of the Project objectives but without any such info. Provide a thorough quantified Economic assessment as the Project Objectives and various points in the text and appendices.**

WIL5-39

**Please include pricing and profitability for rate payers and ROI for each major service area (>10) and regional units.**

WIL5-40

**1-2/4 1.3 Project Components**

The key Project components include...a desalinated water conveyance system:

□ A new **ocean water desalination facility**...would produce 20 MGD (expandable to 60 MGD)...

....

□ A **desalinated water conveyance system** to be constructed inland of the ESGS to deliver potable water produced at the new desalination facility to the **local and regional water supply systems**.  
**Provide all sourcing components, intakes, outlets, and pipeworks/pumps.**

WIL5-41

**1-3/3** Product water conveyance lines would extend easterly within roadway right-of-ways located within various cities (i.e., El Segundo; Los Angeles; Gardena; Hawthorne; Lawndale; and Redondo Beach), and unincorporated Los Angeles County, connecting the new water source with MWD's existing potable water distribution system.  
**Provide quantitative distribution system model for current, 2025, and 2040 periods with source, flows, pressures, and any other operating parameters for the local, regional, and alternative "projects".**

WIL5-42

**1-16 - Exec.Summ.1** 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, 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.

**1-16/Table** West Basin shall implement items a. and b. and progress through the remainder...on the basis of the options' physical and **economic feasibility**, as **reasonably determined by West Basin**, with low **cost options** preferred over **high-cost options**...options have **equivalent costs**, options...shall be selected by West Basin over options enumerated later in the above list.

**Define "reasonable" and "determined" and provide procedures/processes and analyses by WB for costs, benefits, and sources/recipients.**

**Provide numerical/quantitative economic feasibility analyses for project, options, and alternatives.**

**Provide quantitative definitions for high-, moderate-, and low-costs, and their options and for equivalent costs.**

**The EIR states that economics, finance, price, costs are part of the Project objectives but without any such info. Please provide a thorough Economic assessment as the Project Objectives and various points in the text and appendices, including capital+O&M costs vs Returns-on-Investments.**

**Provide pricing and profitability for rate payers and ROI for each major service area (>10) and regional units.**

WIL5-43

WIL5-44

WIL5-45

**4511-23/Tbl. Operation BIO-M2: Entrainment Mitigation: Impacts Entrainment of fish and invertebrate larvae, either directly through the West Basin screened ocean intake or through outfall discharge turbulence, regardless of magnitude, will **result in some loss** of marine **ecosystem** productivity, species diversity, and trophic level energy transfer. Implement Mitigation Measure BIO-M2.**

**4511-23/** develop and conduct an assessment of **larval entrainment** of **both its ocean water intake and its... outfall**, such that the magnitude of the Project's effect on the marine **ecosystem** can be **more accurately** determined and mitigated.

**Outfalls seldom have entrainment other than associated with turbulence, but can have a rich entrained nutrient loads produced by the processing destruction of a vast (more than larvae) ecosystem element of all micro-organisms, larvae + phyto- + zoo-bios.**

**Mention is made of larvae but the entire "Biotic"/Ecosystem discussion has avoided direct discussion of the other "micro"(<1mm dia) ecosystem elements, algae, diatoms, foraminifer, ostracodes, and others as benthons, nektons, and planktons, both infauna and out-fauna.**

**Provide quantitative definitions for "some loss" and for some gains within all elements of the Bay ecosystem, especially for those less than 1.0mm diameters.**

WIL5-46

2-2/3 Section 6, Other CEQA Considerations, discusses the long-term **implications [or impacts]**...Irreversible environmental **changes**..., are considered. The Project's **impacts** respective to **environmental justice**, are evaluated (see Section 2.9 below). The Project's growth-inducing impacts, including the potential for population growth impacts, are also discussed.

2-23/2 2.9 CEQA-Plus This EIR is **intended to satisfy** the "CEQA-Plus" requirements...partially funded by...(USEPA)...Project applicant **must demonstrate** compliance with several federal regulations,...In addition, the Environmental Justice analysis complies with CEQA-Plus requirements; refer to **Section 6.3, Environmental Justice**.

**Define and quantify "implications" vs impacts vs changes, intended, satisfy, demonstrate**  
**Provide quantified definition of ethnic, income, ownerships, and household for all census tracts within the Local and Regional Project service areas.**

WIL5-47

2-4/4 In assessing **local supply availability**, the **reliability** of local groundwater is impacted by legal, water quality, and climate factors. The **recent droughts** have **lowered groundwater tables** and reduced the availability of **sources of local and imported recharge** in West Basin's service area. **Certain beneficial uses** of recycled water in West Basin's service area are **constrained** by **current source water quality issues**.

**Define and quantify availability, reliability, recent vs current, drought, certain, beneficial, constrained, water quality issues,**

**Groundwater conditions are totally inadequately presented. Provide maps and quantified tables for total groundwater (down to -250ft) holding capacity, historic/adjudicated, maximum recharge and production and storage,**

**For proposed Local and Regional Project, distribution area uses each day are not constant throughout the day, and night, and water treatment is best operated at constant flow (e.g., 20-24MGD at 0.83-1.0MG/hr every hour). If night time (10pm-6am flows) diminish to 1/3 the daytime volumes, 0.27-0.33, either production must be reduced or the excess production must be stored, usually in tanks throughout the service area. Such storage has not been described or modeled in the DEIR. The Project does not discuss potential for diurnal production cutbacks, above ground tank storage, or groundwater injection/infiltration as daily storage and recovery for next day's delivery.**

**Current Indirect potable reuse (IPR) uses groundwater resources as a mid-long term storage for days, weeks, and months or more. Similarly direct potable reuse (DPR) and desalination (DSL) can make use of seasonal and daily/diurnal storage beneath the service area with improved efficiencies for production but added operations and facilities for recharge/production.**

**The DEIR does not address the groundwater (or any other means) storage and production within the service areas' resources during diurnal, weekly, seasonal, or other cycles of IPR/DPR/DSL demands vs production.**

WIL5-48

WIL5-49

WIL5-50

WIL5-51

WIL5-52

2-7/2 MWD's IRP assumes that even under implementation of WaterFix, MWD's service area must develop an **additional 230,000 AFY** of new water supply within the planning period (MWD 2016).

**Provide MGDs & MWD-WtrFx service area for public understanding of significance - 230000afy = 630 afd = 205 MGD??? for every where south of the ForeBay, including SJValley and south of Orange County???**

**Unclear as to whether Project's 20 or 40 or 60 MGD is included for 10-30% of total.**

WIL5-53

2-8/3 **...11 cities and unincorporated areas**...hold the **groundwater rights to WCGB**. The average **production**...between 2005 and 2015 was approximately 42,000 AFY,...17 percent of total water demands...(WRD 2017). The groundwater **extraction** in the WCGB has been in decline since 2011, with the extracted volume recorded in Fiscal Year 2015-16 of approximately 31,600 AFY (WRD 2017).

**The DEIR must provide service area boundaries and all adjudicated groundwater basins along with recharge basins and wells.**

WIL5-54

**WaterReclamationDistrict**, 2017. Water Master Service in the West Coast Basin – Los Angeles County. Online:

<http://www.wrd.org/sites/pr/files/west%20coast%20basin%20watermaster%20report%20016.pdf>.

**Follow spell-out format of other acronyms in references.**

WIL5-55

**2-8/3** Historical contamination...made finding groundwater of high quality within the WCGB challenging. ...made acquiring suitable sites that...produce high quality of groundwater with minimum treatment costly...high land costs compounded with high treatment costs...discourage retailers and other groundwater right holders to use such a resource when more economical imported water is readily available.

*Provide GW rights holders map and listing, and GW volumes-yields/quality (hi-mod.-low) maps for all WB accessible GW resources.*

*Provide costs comparisons for sources, lands, and treatment, including all existing, locally potential, and future local and regional and state sources.*

*Define and provide "more economical", moderately-economic, and less-economic imported water.*

*Define and provide "minimum", "high", "discourage", "other", and "readily available".*

WIL5-56

WIL5-57

WIL5-58

**2-8/4** Although West Basin does not supply groundwater to retail agencies,...supply a portion of the supply used for groundwater replenishment...customer agencies operating within West Basin's service area extracted 31,288 **AF** of groundwater...; however, WRD replenished 18,198 **AF** and 3,460 **AF** into the West Coast Barrier and Dominguez Gap Barrier...(West Basin 2016). Although pumping rights are established, the reliability of groundwater is limited by the adjudication.

*Unclear as to af/day, month, or year, use consistent units afy or af/y.*

*Define and differentiate "recharge" vs "replenishment", same for "extract" vs "produce", smelting extracts, oil wells produce.*

WIL5-59

**2-11/3** Further, the Project would provide the only hydrologically independent, locally controlled water supply source for the West Basin service area.

*As indicated above a portion of groundwater recharge is provided by WB from "other sources" which are independent of "hydrological" sources, kind of.*

**2-12/1** ...expansion of recycled water production and use under the City of Los Angeles's OneWater Program is expected to limit West Basin's recycled water program's ability to access no more than **70 MGD** of effluent...contractual obligations to non-West Basin service area customers, LADWP, and the City of Torrance, ...treatment losses [46% loss], there will only be approximately 38 MGD of non-potable and potable reuse water remaining for West Basin's service area.

*Define/quantify "expected to limit".*

*Describe/quantify effluent "losses".*

*Provide name and locations and conveyance connections for "non-WB service area customers".*

*Provide locations/service areas for "potable reuse" and "for".*

WIL5-60

**65\ 2-13** Statewide Actions identified....Protect and restore important ecosystems.

*Proposed project(s: local and regional) significantly and adversely impacts and degrades the entire micro-biotic components of the southern Santa Monica Bay "ecosystem". Provide quantified and modeled justification for compliance with "Protect and restore important ecosystems", with regard to all elements of the ecosystem and specifically for nutrient flows through the micro-biotic elements.*

WIL5-61

**2-8/3** Additionally, surging real estate prices and competition for land have made acquiring suitable sites that can produce high quality of groundwater with minimum treatment costly. If treatment is needed, high land costs compounded with high treatment costs further discourage retailers and other groundwater right holders to use such a resource when more economical imported water is readily available.

*Define/quantify minimal or high treatment and lands and their costs, "discourage", and "imported" from where (including proposed WB Regional Project).*

*Provide quantified/modeled economic, pricing, and competitive analyses and assessments for real estate, treatment, and water rights (e.g., subsurface property prices/values).*

*Provide all survey information regarding good/moderate/poor groundwater qualities within WB service areas*

WIL5-62

**2-10/4** Any further investigations...require subsequent interagency agreements between LASAN, LADWP and West Basin for...planning and design, construction and operation of facilities...assignment of cost responsibilities for financing and operating the project.

*Provide drafts for administrative, costs, and financing arrangements, costs, and financing.*

WIL5-63

**2-13/2** The update identifies local water sources as an integral part in achieving sustainability. According to the draft California Water Plan Update, "Recycled water and desalination, which were once cost prohibitive, are now becoming more viable sources." The update states that local projects, such as desalination, have helped "increase regional self-reliance and resiliency" (DWR 2018).

**TBR**

WIL5-64

**2-15/2** The 2015 UWMP details how West Basin manages its water supplies and demands under **all hydrology conditions**...demonstrates how West Basin proposes to meet its service area's **retail** demands over the next 25 years and provide long-term water reliability...includes the most recent projections of future water demands for its service area through 2040...concludes that West Basin's projected water demand of approximately **200,000 AFY would be maintained from 2020 through 2040**.

**Define/quantify "all" hydrological conditions [including <5in rain/year and higher (10ft)/warmer (+5oF) Bay water levels] and "retail demands".**

**Provide simple/singular/consistent terminology of MGD or equivalent 548 af/d = 179MGD for public understanding.**

WIL5-65

**2-15/3 Table 2-1** outlines West Basin's service area projected water supply, according to supply source, from 2020 through 2040. As shown, including conservation, West Basin's water supply would range between 198,000 and 206,000 AFY from 2020 through 2040. As also shown, West Basin is projecting to significantly increase current recycled water supplies as well as invest in over 21,500 AFY of ocean water desalination supply. Combined with an additional increase of conserved supply through water use efficiency programs, imported water use by 2040 is expected to be reduced by 15 percent from 2020 levels.

**TABLE 2-1 EXISTING AND PROJECTED WATER AVAILABILITY (AFY)**

**TBR**

WIL5-66

**2-20/3 Section 6, Other CEQA Considerations**, discusses the **long-term** implications of the proposed Project. Irreversible environmental changes that would be involved in the proposed action, should it be implemented, are considered. The Project's impacts respective to **environmental justice** are evaluated (see Section 2.9 below).

**Environmental justice must include clear definition and quantification of customer services receiving identical quality/pressures/flows while paying the same rates/surcharges throughout the WB service area. Provide a specific distribution model for production and customer delivery.**

WIL5-67

**2-29/3 2.10.1 West Basin Pilot Project**

...By definition, a pilot-scale facility is an early step in the evaluation process that uses small-scale equipment to test for basic water quality and operating parameters as **cost-efficiently as possible**.

**Define/quantify "cost effectively" and "as possible" [doubtful achievement].**

WIL5-68

**84\2-32\2** Characterizing **phytoplankton** taxonomy at the El Segundo ocean intake

**Phyto- is a very limited portion of the ecosystem at only the intake; provide survey/monitoring data for all micro-plankton, nekton, and benthon elements.**

**Define/quantify "characterizing...taxonomy" vs ecology, biology, biomass, etc.; revise all references o anything related to ecosystems and their biology.**

**Provide similar information regarding the "outfall", past and proposed.**

WIL5-69

**2-33/3** Technical memoranda included: ....  TM 7 – **Project Costs and Funding Plan**

**Provide complete financial, economic, and costs/pricing/ROI analyses for Project(s) and service areas..**

WIL5-70

**2-37/1 2.10.10 Subsurface Intake Evaluations\7** ...West Basin has **extensively evaluated** the technical, **economic**, social and environmental feasibility of incorporating subsurface seawater intake (SSI) systems into project design.

**Define/quantify "extensive evaluations", especially for economic and social aspects related to Environmental Justice in the service areas.**

WIL5-71

**2-39/4** The feasibility of SSI technologies depends on a variety of site-specific conditions and criteria, including hydrogeologic, oceanographic, geochemical and water quality constraints, land use and sensitive habitat, maintenance requirements, and other technical and **economic risk factors and uncertainties**, such as complexity of...**economic viability**.

**Provide complete financial, economic, risks & their management, and costs/pricing/ROI analyses for Project(s) and service areas. Define/quantify viability for operational, administration, technical, and fiscal/financial aspects of Projec(s), Local and Rregional).**

WIL5-72

**2-41/5** The life cycle costs were also estimated for hybrid 40 MGD intake systems consisting of both an open ocean intake... **and screened** capacities.... Lowering...rates could decrease the overall intake costs but it would diminish the economies of scale....would range between \$53 million and \$113 million, or \$21.2 million and \$45.2 million per MGD of capacity....translates to approximately four times of the estimated total costs of the wedgewire screen only option or, on a cost-per-unit-volume-water intake basis, more than 70 times more expensive than the wedgewire screen only option. (**Appendix 2B, Seabed Infiltration Gallery Construction and Life-Cycle Costs**).

**Define/quantify and demonstrate basis for capital, operating, and LC costs comparisons and various incremental flows and screen sizes.**

WIL5-73

**2-43** Geosyntec Consultants, 2016. Feasibility Assessment of Subsurface Seawater Intakes Proposed Desalination Facility El Segundo, California, **March 2016**.  
Geosyntec, **xxx** 2017a. Subsurface Seabed Well Construction Costs, Proposed Desalination Facility..., prepared for West Basin Municipal Water District. **xxx**  
Geosyntec **xxx**, 2017b. Seabed Infiltration Gallery Construction and Life-Cycle Costs, Proposed Desalination Facility..., prepared for West Basin Municipal Water District. **December 2017**.

**Provide singular consistent format for all references and citations**

WIL5-74

**2-44/** State...(SWRCB), 2004. Division of Financial Assistance. Environmental Review Process Guidelines for ...Loan Applicants, September 2004 at [http://www.swrcb.ca.gov/water\\_issues/programs/grants\\_loans/srf/docs/appendix\\_e.pdf](http://www.swrcb.ca.gov/water_issues/programs/grants_loans/srf/docs/appendix_e.pdf) (**accessed February 21, 2017**).

**Reference/Source Cited is accessible online, confirm all referenced-cited documents in the DEIR are accessible online or in appendices; provide those that are not.**

WIL5-75

**3-2/6** 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. Proposed distribution pipelines alignments and pump station locations are shown in **Figure 3-5**.

**Provide model of entire existing distribution system and their peak/normal/low flow and pressure and the flow charge rates for all service connections, the same for the Project-Local and for the Project Regional. Provide current and local and regional delivered water costs,**

WIL5-76

### **3-14/2 Desalinated Water Conveyance**

New conveyance infrastructure would convey product water from the desalination facility to the existing distribution system that delivers potable water to local area and 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.

**Provide model of entire existing distribution system and their peak/normal/low flow and pressure and the flow charge rates for all feeder connections, the same for the Project-Local and for the Project Regional.**

WIL5-77

**3-14/3** Several conveyance alignment alternatives...as shown in Figure 3-5. 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 (see Figure 3-5).

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.



...pipeline alternative alignments would be routed through various alternative routes to connections along the existing West Basin and West Coast Feeders. The **various pipeline conveyance and alternative conveyance routes** are shown in Figure 3-5.

**TBR**

WIL5-78

**3-18/2 Desalinated Water Conveyance Facilities**

For the Regional Project, a 48-inch- or 54-inch-diameter Regional Pipeline would be extended from the 54-inch Local Project Pipeline within El Segundo Boulevard to a connection on MWD's existing Sepulveda Feeder on Van Ness Boulevard. The alignment for the Regional Pipeline would be one of the variant alignments shown in Figure 3-5. A regional pump station would also be required somewhere along the Regional Pipeline alignment in order to provide the additional pressure needed to connect to the Sepulveda Feeder. This regional pump station could be sized for up to 67.5 MGD to allow for all flow from the desalination facility to be pumped to the Sepulveda Feeder. The alternative pipeline corridors for the Regional Pipeline and five potential sites for the regional pump station are shown in Figure 3-5.

**TBR**

WIL5-79

**3-33/2** 3.6 Regional Project Construction Construction and commissioning of the 60 MGD Regional Project would require approximately 36 months...Commencement of Regional Project construction and precise phasing is unknown and...**determined based upon funding sources, financial partners, and specific end users** of the additional water supply beyond 20 MGD. For purposes of the environmental analysis, Regional Project construction is assumed to commence in 2026 and last 36 months.

***Provide comparative and quantitative listing of all funding sources, financial partners, and end-users for both the local and regional DeSal elements.***

WIL5-80

**4.**

**5.2-22/2 5.2.4 Impacts and Mitigation Measures**

**Plan Consistency Impact AQ 5.2-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?**

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and **objectives** of the regional air quality plans, and thus if it would interfere with the region's ability to comply with federal and state AAQS. Growth assumptions within the AQMP are based on growth assumptions and land use designations included within local general plans.

**TBR**

WIL5-81

**5.3-2/4 Clean Water Act Section 401** Applicants for a federal license or permit for activities that may discharge to waters of the United States must seek Water Quality Certification from the state or Native American tribe with jurisdiction. Such certification is based on a finding that the discharge would meet water quality standards and other applicable requirements. In California, Regional Water Quality Control Boards (RWQCBs) issue or deny Certification for discharges within their geographical jurisdiction. Water Quality Certification must be based on a finding that the proposed discharge would comply with water quality standards, which are defined as **numeric and narrative objectives** in each RWQCBs Basin Plan. Where applicable, the State Water Resources Control Board (SWRCB) has this responsibility for projects affecting waters within the jurisdiction of multiple RWQCBs. The RWQCB jurisdiction extends to all waters of the state and all waters of the United States, including wetlands.

**TBR**

WIL5-82

**5.3-1\FN1** \1...West Basin intends to apply to the State Revolving Fund (SRF) Program, environmental review of the project must comply with **CEQA-Plus requirements**....must comply with the **federal ESA**,....

***Provide references for CEQA-Plus and differences between standard and "-PLUS".***

WIL5-83

**5.3-9/2 Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties**

The Los Angeles Region Basin Plan (Basin Plan) was adopted by the Los Angeles RWQCB in 1994. The Basin Plan's purpose is to preserve and enhance water quality and also protect the beneficial uses of all regional waters. As such, it designates the beneficial uses for surface and ground waters, sets objectives to protect those uses, and describes implementation procedures to protect all waters within the Los Angeles region. The Thermal Plan and Ocean Plan are incorporated into the Basin Plan by reference.

**TBR**

WIL5-84

**5.4-1/1 5.4 Cultural Resources**

This section describes the applicable laws and policies relating to cultural resources, discusses environmental settings of cultural resources in the Project area, and evaluates potential environmental impacts associated with implementation of the proposed Project. This section also includes a discussion of tribal cultural resources to fulfill California Environmental Quality Act (CEQA) requirements.

**Incomplete and inadequate section; entire sector setting, assessment and mitigation disregards offshore archeological potential and any review of available borings**

**Sector setting and supporting appendices do not mention available historic - 1923-1943 aerial photos (EDR) which are commonly reviewed for historic structures, land uses, and potential sources of hazardous land uses and contaminations.**

**No discussion of cultural resources below sea level related to past or project borings.  
Revise entire Section, withdraw/revise/recirculate entire DEIR.**

WIL5-85

**5.4-16/2** During the 1920s,...decided a publically owned **electrical system** made economic sense and began purchasing...of...**Edison's distribution network**. By 1939, "the City...reached an agreement,...all Edison **generating and delivery facilities** within...city limits...."

**5.4-16/3** During the 1920s, most of the power...generated by hydroelectric plants.... **City's**...knew additional power plants...needed....Bureau began...construction of a steam plant in Wilmington...(Prosser 2017).

**5.4-16/4** Construction began on the Harbor Plant in 1941-42,....Unit Number One came on line in 1943....Unit Number Two was not completed until 1947. Three more units...by 1950. With its boilers designed to burn either natural gas or fuel oil, the Harbor Plant was a preview of the direction...in the postwar years (Prosser 2017).

**Provide relevance of Wilmington discussion to the Project. Provide historic aerial/satellite photos/image (e.g., EDR photos) for the Project site from 1923-2015 and physical changes of the site.**

WIL5-86

**5.4-24/5** Geoarchaeological Conclusions Based on this geoarchaeological review,...the **offshore screened intake facility** are underlain by sediments deposited during the **Late Pleistocene/Early Holocene**, which encompasses the prehistoric use of the region, and thus harbor the **potential to encounter buried archaeological deposits**. The **western** portion of the proposed conveyance pipeline and alternative pipeline alignments are **underlain by sediments that were deposited and stabilized during the Pleistocene, PRIOR TO THE PEOPLING OF NORTH AMERICA**, and have **lower potential for the presence of buried archaeological deposits**.

**Prehistoric archeological sites/resources (several sites in Wyoming, New Mexico, East Coast, etc.) have been dated before 12,000 yr BP and well into the Pleistocene. "Prior..."statement is not based on facts presented and appears to conflict/contradict statements in appendices (e.g., "have the potential to contain cultural remains").**

**As no numerical age dating or interpretations have been provided, this statement is either erroneous or prejudiced, not based on facts provided.**

**Withdraw entire section, revise all material, and recirculate as supplemental/subsequent DEIR.**

WIL5-87

**7B-1/3** During the last Ice Age...sea level was **substantially lower** than current conditions (approximately -120 m...l) and the **coastal plain in the vicinity of the project site extended several miles offshore** of its current location. ....project site was well inland at the Late Pleistocene/Early Holocene transition....an outfall that will extend 1,000 feet...will be sited on part of the continental shelf that was inundated **since the end of the last Ice Age**.

**7B-2/3** The eastern portions of the proposed conveyance pipeline and alternative alignments are underlain by Young Alluvium (Qae) deposits that include floodplain deposits originating from Dominguez Creek as well as alluvial fan deposits. Dominguez Creek may have been a locus of human activity throughout prehistory due to the **periodic fresh water** and plant and animal resources it may have provided. Accumulation of deposits through alluvial processes **have** the potential to have buried archaeological remains, suggesting that these landforms have a higher sensitivity to contain buried, intact archaeological sites.

**7B-2/5** The offshore portion of the ocean water intake system which includes the construction of a screened intake facility located 2,500 feet west of the proposed desalination facility is underlain by Pleistocene sedimentary deposits (Qps). Marine borings **near the coastal margin near the ESGS Facility** have been interpreted as "Recent and Upper Pleistocene" (Holocene and Late Pleistocene) dune sands (California State Lands Commission, 2016). Since current sea level was established approximately 4,000 years ago, the offshore portion appears to have the **potential to contain cultural remains** dating between approximately 12,000 and 4,000 years ago.

**Mitigation must include:**

**Borings/analyses and remote-submersible/diver surveys for boring locations and excavations;  
Additional borings / geophysical profiling of 10ft of bottom sediments, -100 - -200ft depths/elevations;  
Radiocarbon dating of Holocene/Post-Pleistocene or years 12K-4K.**

WIL5-88

**5.4-52/2-55 5.4.7 Sources Cited**

5.4-52/2 - 55 5.4.7 Sources Cited

BCR Consulting, LLC, **2016**. Cultural Resources Assessment: West Basin Ocean Water Desalination Project, **March 18, 2016**.

Bean, Lowell John, and Charles R. Smith. Gabrielino, **1978**. In *California*, edited by Robert F. Heizer, pp. 538-549. Handbook of North American Indians, **Vol. 8**, William C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., **1978**.

Bickel, Polly Mcw, **1978**. Sea Levels Along the California Coast: Anthropological Implications. In *The Journal of California Anthropology*, 5(1):6-20, **1978**.

**Reports cited are not available to the public in appendices or online; provide for direct public access not as part of a Public Records Act request.**

**Provide single format and consistent terms for references and citations throughout the DEIR.**

WIL5-89

**5.5-3/2** The Clean Energy and Pollution Reduction Act of 2015,...approved by Governor...does the following:  
(1) increases the standards...by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be **increased to 50 percent**...;  
(2) requires...to establish annual targets for statewide energy efficiency savings and demand reduction...achieve a cumulative **doubling of statewide energy efficiency savings in electricity**...final end uses of retail customers...;  
(3) provides for the evolution of the Independent System Operator into a regional organization; and  
(4) requires the state to reimburse local agencies and school districts for certain costs mandated....

Among other objectives, the legislature **intends to double the energy efficiency savings** ...end uses of retail customers through energy efficiency and conservation (SB-350 Clean Energy and Pollution Reduction Act 2015).

**TBR**

**5.5-10/6** Because of increasing transportation costs and fuel prices, contractors and owners have a **strong financial incentive** to avoid wasteful, inefficient, and unnecessary consumption of energy....growing recognition...that sustainable...11/1...construction is not prohibitively expensive, and...significant cost-savings potential in green building practices and materials.

**Define/quantify analyses for Strong, Financial, Incentive, Prohibitively, & Expensive.**

WIL5-90

WIL5-91

**5.5-14/3 Local and Regional Projects Construction-Related and Operational Impacts**

All Project Components While there are **no local or regional energy conservation plans** that are directly applicable to the Project, the 2017 Scoping Plan Update does include **high-level objectives and goals intended to reduce energy demand**...in the context of developing "more reliable water supplies...provided by a **more resilient, diversified, sustainably managed water resources system**,"...how the state is currently implementing several targeted agricultural, urban, and industrial-based water conservation, recycling, and water use efficiency programs as part of an **integrated water management effort** that will **help achieve** GHG reductions through reduced energy demand within the water sector.

**Too "high level", rendering the discussion totally inadequate, if no incomplete and unqua.**

**Define/quantify "help achieve"**

**Define/quantify "more resilient, diversified, sustainably managed",**

**Sub-Sector is inadequately presented and requires withdrawal/revision/recirculation.**

WIL5-92

WIL5-93

WIL5-94

**5.6-11/1 Strong Seismic Ground Shaking**

The nearest active **fault** to the proposed ocean water desalination facility, screened ocean intake, and concentrate discharge sites **are** ...

Newport-Inglewood Fault Zone,...6 miles to the east of the proposed desalination facility and about 2,000 feet northeast of the northeastern end of the proposed new conveyance pipeline alignment...

**Palos Verdes Fault Zone...1.8 miles west of the western end of the intake and discharge pipes...**

Newport-Inglewood Fault Zone ...generating earthquakes **in excess of 6.9 Mw**,...Palos Verdes Fault Zone...**between 6.0 and 7.0 Mw or greater (SCEDC 2016)**.

**5.6-27** Southern California Earthquake Data Center (SCEDC), 2016. *Significant Earthquakes and Faults, Palos Verde Fault Zone*, <http://scedc.caltech.edu/significant/palosverdes.html>, October 26.  
**Setting must relate service areas and distribution networks to be supplied by Local and Regional Project elements and expected seismic forces for design and operations following a seism., a map would be nice. Inadequate reference to SCEDC requires greater specificity and indicates the preparers are aware of the source but failed to make use of such for locating recorded earthquakes: on- and offshore and around and beneath the Project or Program (see tables) related to the named and unnamed faults. Sub-Sector is inadequately presented and requires withdrawal/revision/recirculation.**

WIL5-95  
WIL5-96  
WIL5-97

**5.6-11/2 Peak Ground Acceleration and Seismic Soil Class**

The 2016 California Building Code...recommends that the design of structures be based on the risk-targeted maximum considered earthquake (MCER) and design response spectrum.... equal to two-thirds of the MCER spectrum...not include near-source factors that may be applicable to the design of structures on-site.

**No recommended design MCER/DRS**

**No mention of SCEDC on-line catalogues. No assessment of reported seisms to known or unknown fault planes beneath the Project/Program, e.g., 1940/11/01 07:25 4.18RM 33.84283 -118.46467 6.0km depth 22,000ft offshore of RdB and 1988/09/12 13:24 4.04RM 33.86700 -118.45700 3.1km depth 8000ft offshore.**

**Sub-Sector is inadequately presented and requires withdrawal/revision/recirculation.**

**Provide basis and distinctions for use of "in excess of" or "or greater".**

**Provide existing 1932-Date seismic records and their most likely fault planes from SCEDC.**

**Sub-Sector is inadequately presented and requires withdrawal/revision/recirculation.**

WIL5-98

**5.9-39/3** Additionally, Santa Monica Bay is susceptible to the effects of near-field (near-vicinity) tsunamis...and/or a large earthquake on any of the nearby faults....Palos Verdes fault zone,...northwest off the Long Beach...coast, the San Pedro Basin fault zone, and Santa Cruz-Santa Catalina Ridge fault zones (see Section 5.6, *Geology, Soils, and Seismicity*, for additional details)...The ESGS site is immediately adjacent to, but is located outside of, the tsunami inundation hazard zone,...(**Figure 5.9-3**).

**Does not include offshore facilities, and zone was established based on historic sea levels without adjustments for current sea level rises.**

**Provide revised, quantified, illustrated inundation for 2040 and with major epicenter at <10,000ft below surface.**

WIL5-99  
WIL5-100

**5.9-4/1-2-3** Army Corps of Engineers (USACE) is the permitting agency for ocean disposal of dredged material. The transportation of dredged material for disposal into ocean waters is permitted by USACE only after environmental criteria established by USEPA are applied....USEPA manages three ocean disposal sites off Southern California that qualify under this criterion: LA-2 off the ports of Los Angeles and Long Beach, LA-3 off Newport Beach, and LA-5 off San Diego Bay....restricted to the disposal of suitable (clean) dredged material only. Dredge disposal for the Project has the potential to occur only at LA-2.

**TBR**

**5.9-4/2** ...requirements of the Site Management and Monitoring Plan, required for all ocean dredged material disposal sites, as well as the compliance and enforcement provisions of the MPRSA regulations themselves, apply to all projects using LA-2, including projects which have received an "ocean dumping permit" issued by USACE under Section 103 of the MPRSA, as well as federal projects conducted by or for USACE. The LA-2 disposal site is located on the outer continental shelf margin, at the upper southern wall of San Pedro Sea Valley, at depths from 380 to 1,060 feet (110 to 320 meters), about 6.8 miles (11 kilometers [km]) south-southwest of the Queens Gate entrance to the Los Angeles/Long Beach Harbor. A comprehensive description of physical, chemical, and biological characteristics of the sediments and water column...FEIS (USEPA 2005).The objectives for management of all the southern California ocean disposal sites include:

- Protection of the marine environment
- Beneficial use of dredged material whenever practical
- Documentation of disposal activities...achieve these objectives by jointly administering the following activities: regulation and administration of ocean disposal permits; ensuring suitability of dredged material for ocean discharge; pre-dredge sediment evaluations; project-specific compliance tracking of disposal operations; evaluation of permit compliance and monitoring results; implementation of a site monitoring program, and periodic review of the Site Management and Monitoring Plan.

WIL5-101

Management decisions about the suitability of dredged material for ocean disposal are guided by criteria in the MPRSA and USEPA's Ocean Dumping Regulations; guidance on specific aspects of these regulations is provided in Ecological Evaluation of Proposed Discharge of Dredged Material into Ocean Waters (the "Ocean Testing Manual"; USEPA/USACE 1991), or subsequent national updates.

**TBR**

WIL5-102

**5.9-47/3** Prior to constructing the connections between existing and new pipelines,

**TBR**

WIL5-103

**5.9-47/4 5** Mitigation Measures: Implement Mitigation Measure HAZ-5 for impacts to the screened ocean intake and concentrate discharge facilities. No mitigation measures are required for other facilities.

Local Project Significance Determination: Less than Significant with Mitigation Incorporated.

**TBR**

WIL5-104

**5.9-56/1** Given that the proposed operational discharge would not increase the total load of constituents in Santa Monica Bay receiving waters as compared to ambient conditions, nor violate NPDES effluent limits, the water quality impact associated with the discharge of brine would be less than significant. \21

\21 Given that the proposed operational discharge would not increase the total load of constituents in Santa Monica Bay receiving waters as compared to ambient conditions, nor violate NPDES effluent limits, the water quality impact associated with the discharge of brine would be less than significant.

**TBR**

WIL5-105

**5.9-80** 5.9.7 Sources Cited

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Arcadis, 2013. Ocean Water Desalination Program Master Plan (PMP), **January 2013**.

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2015. **City of Los Angeles, 2017. City of Los Angeles Stormwater**

**Provide singular consistent format with direct public access, same as above.**

WIL5-106

...**p.5.9-81** Program: Santa Monica Bay Watershed. Accessed online November 10, 2017 at:

<http://www.lastormwater.org/about-us/about-watersheds/santa-monica-bay/>

City of Los Angeles, 2017. City of Los Angeles Stormwater Program: Santa Monica Bay Watershed. Accessed online November 10, 2017 at: <http://www.lastormwater.org/aboutus/about-watersheds/santa-monica-bay/>

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Dawoud, Mohamed A. and Mohamed Al Mulla, 2012. *Environmental Impacts of Seawater Desalination: Arabian Gulf Case Study*, International Journal of Environment and Sustainability, Vol. 1 No. 3, pp. 22 - 37. 2012.

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West Basin Desalination DEIR SCH # 2015081087

Coastal Plain of Los Angeles County Groundwater Basin, West Coast Subbasin. California's Groundwater Bulletin 118.

**Provide singular consistent format with direct public access, same as above.**

WIL5-107

**5.9-82**

LARWQCB, 1994. *Water Quality Control Plan: Los Angeles Region*. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura County.

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**Rogowski, P.A., et al.** An assessment of the transport of southern California stormwater ocean discharges. Mar.Pollut.Bull.(2014), <http://dx.doi.org/10.1016/j.marpolbul.2014.11.004>.

**Provide singular consistent format with direct public access, same as above.**

WIL5-108

**708\5.11-6/2 Marine Life Protection Act...**was adopted in 1999 to protect **ecosystem structure and function**.

**708\5.11-6/4 ...**works in concert with the MLPA by advancing fishery management as an important element of **ecosystem integrity and sustainability**. Under the **MLPA...**, implementation of the **California Nearshore Fisheries Management Plan** and the **California Market Squid Fisheries Management Plan** affect fish species found in Santa Monica Bay.

**Define/provide quantified ecosystem model to relate affected trophic/nutrient levels with the support of fisheries and squid populations.**

WIL5-109

**709\5.11-7/2** Under the California Coastal Act, "environmentally sensitive area means any area in which **plant or animal life or their habitats** are either rare or especially valuable because of their **special nature or role in an ecosystem** and which could be **easily disturbed or degraded by human activities and developments**" (PRC Section 30107.5).

**Define/provide quantified ecosystem model to relate affected plant/animal/biotic/nutrient levels with the support of fisheries and squid populations.**

WIL5-110

**710\5.11-8/2** The basis for water quality objectives...protection of beneficial uses designated for each section of coastline by RWQCBs. The designated beneficial uses relevant to marine resources...are as follows:

- Marine Habitat – Uses of water that support **marine ecosystems**...marine habitats, **vegetation**..., fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).
- Shellfish Harvesting – ...support habitats suitable for the collection of **filter-feeding shellfish** (e.g., clams, oysters, and mussels)...includes waters that have in the past, or may in the future, contain significant shell fisheries.

**Define/provide quantified ecosystem model to relate affected trophic groups - plant/animal/biotic/nutrient levels with the support of fisheries and squid populations and higher predator/trophic levels.**

WIL5-111

**717\5.11-15/2 Subtidal Benthic Habitats** Two subtidal (submerged) types of **benthic habitats** occur in the marine study area: soft substrate (sandy) and hard substrate (rocky).

**717\5.11-15/3 Sandy Subtidal** The **benthic invertebrate infauna**...marine ecosystem. The organisms...food source for fish and other larger invertebrates,...contribute to nutrient recycling and detoxification of pollutants (MBC 2017). Some species are highly sensitive to effects of human activities,... community abundance and

composition because it determines sediment disturbance (through wave energy and burrowing by organisms), oxygen content, and food availability. In turn, the organisms affect the environment through...predation.

**Define/differentiate benthic and infauna invertebrates**  
**Not all organisms "predate"...plants, bacteria, worms, etc.**

WIL5-112

717\5.11-15/4 The benthic infaunal communities...assessed continuously as part of the NPDES discharge permit monitoring for the ESGS. The most recent assessment in 2015 reported...benthic infaunal community consists primarily of mollusks (clams and snails), small annelid worms, arthropods (primarily amphipods and other small crustaceans), nemerteans, and nematode worms (Table 5.11-1)...listing of the 30 most abundant infaunal taxa observed...in 2015 (MBC 2017). The infaunal community inhabiting the deeper stations (B5-B8)...were reported to be more diverse and have higher individual species abundances than...at the sampling locations located closer inshore (B1-B4).

717\5.11-15/4 At the deeper stations the most abundant organisms were the clam..., nematode worms, the nemertean worm..., and the annelid.... shallower stations the most abundant organism was the annelid....

717\5.11-15/5 These taxa were consistent with those that have been encountered in the marine study area since 1990 (MBC 2017).

717\5.11-15/6 Benthic macrofauna...invertebrate species that live on the bottom sediments or are demersal organisms...immediately above the seafloor....tend to be mobile scavengers and predators, ...distributions can be patchy and highly variable between locations and seasons. Trawl sampling conducted offshore of the ESGS between 1978 and 2013 have documented...a number of different macroinvertebrate species (MBC 2017).

723\5.11-21/3 Northern anchovy...important component of...ecosystem. Anchovy eggs and larvae are prey for vertebrate and invertebrate planktivores. Juveniles in nearshore areas support a variety of predators, including birds and other fishes.

753\5.11-51/2 Based on results compiled from field sampling by Tenera and MBC (2008) in the vicinity of the ESGS, larvae from 12 different species/groups of fish were used to scale the ESGS ETM results to estimate proportional mortalities (Table 5.11-8) to the proposed Local and Regional Project intake volumes (HDR 2018; Appendix 4D). These mortalities were then used to calculate the potential impact that entrainment of larval fish and invertebrate taxa could have on the marine ecosystem in terms of loss of energy transfer from one trophic level to another, and overall loss of productivity of the Project.... This loss is referred to as the area of production foregone (APF) and this projected loss must be compensated for through a fee or habitat restoration, in accordance with the OPA.

**Define/differentiate benthic and infauna invertebrates**

**Define/quantify "continuously", primarily, most abundant, taxa vs animals, more diverse, deep, higher... abundance, deeper, closer, "a number", taxa-macrofauna-organisms, sampling-trawls, mobile, patchy, highly, mega-meso-micro-nanno-"macroinvertebrate"**

**Withdraw-revise-recirculate entire biotic and ecosystem discussions.**

WIL5-113

2-23/2 In addition, the Environmental Justice analysis complies with CEQA-Plus requirements; refer to Section 6.3, *Environmental Justice*.

6-9/3 6.3 Environmental Justice ...section discusses the environmental justice issues pertaining to the Project and evaluates the potential for the Project to disproportionately affect minority and low-income populations.

6-9/3 6.3 Environmental Justice The following section discusses the environmental justice issues pertaining to the Project and evaluates the potential for the Project to disproportionately affect minority and low-income populations. Data presented in this section was obtained from two data sets from the U.S. Census Bureau 2011–2015 American Community Survey (ACS) 5-year estimates.

6-10/2 As a result, the city of El Segundo (desalination facility) and the city of Hawthorne (pump station) are the only cities where aboveground infrastructure would be implemented. The aboveground facilities include the ocean desalination facility and the proposed regional pump station....total population of individuals within these census tracts is 15,796. **Table 6-2** lists all of the census tracts affected by the Local Project and Regional Project facilities and the City of Manhattan Beach tract....

**Clearly define all census tracts and their service areas and their related EJ characteristics and provide models changes of pressure, flow, quality, and rates for local and regional Project elements.**

WIL5-114

**6-12/4 6.3.3 Significance Thresholds and Criteria**

For the purposes of this EIR and consistency with NEPA or CEQA-Plus Guidelines, applicable local plans, and agency and professional standards, the Proposed Project would be considered to have a significant effect on environmental justice if it would:

- Affect...health or environment of minority or low-income populations disproportionately. *?????? No. 2 ???? Clearly define all census tracts and their service areas and their related EJ characteristics and provide models changes of pressure, flow, quality, and rates for local and regional Project elements.*

WIL5-115

**6-13/1 Impacts and Mitigation Measures** Generally speaking, operation of proposed facilities including desalination facilities and the pump station, would not create **localized impacts that could negatively** affect the surrounding environment or community public health **(as evidenced in the analyses provided in other sections of this EIR).**

*Define/quantify "Generally speaking", evidenced, localized, negatively vs adversely.*

*Provide evidence and references to specific page/paragraphs.*

*Provide service operation effects analyses and assessments for supply quality, pressures, and flows by neighborhood and census tract.*

*Clearly define all census tracts and their service areas and their related EJ characteristics and provide models changes of pressure, flow, quality, and rates for local and regional Project elements.*

WIL5-116

WIL5-117

WIL5-118

**6-13/2** Based...Local Project and Regional Project components in the cities of El Segundo and Hawthorne would not be **located** in areas with significantly larger minority and/or low-income populations on average, relative to the overall characteristics of their respective cities...During operation of the Local and Regional Projects, residential areas would not be significantly impacted because the location of the ocean water desalination facility would be within an existing power generating facility site.

*No service area impacts are assessed for effects, detriments, benefits, and equitable distribution of supply quality, pressures, and flows by neighborhood and census tract.*

*Provide service area changes for supply reliably, quality, pressures, and flows by neighborhood and census tract.*

WIL5-119

**6-13/3 Operation** of the proposed pump station **could** occur...on vacant and/or disturbed land. **Even though**...could be located within an area of the **city of** Hawthorne...area is not considered to have a significantly high minority population...within 10 percent of the overall **city's** minority population percentage....Local and Regional Project would not be within areas significantly characterized by low income or minority populations. **Nonetheless, the location of such facilities in areas characterized by minority or low income populations would not adversely affect the environment or public health of such communities.** Impacts are considered less than significant.

*Pumps create pressure and increase flows. Provide distribution model for current, local, and regional project elements showing distribution flows, pressures, and qualities and especially for periods of 7am-10pm and 11pm-6am.*

WIL5-120

**7-1/2**  Section 7.2, *Initial Screening of Alternatives*: This section incorporates a brief discussion of eight alternatives which were determined to fail to meet the objectives of the Project and/or are clearly infeasible. Thus, they were rejected from further evaluation.

Section 7.3, *CEQA Alternatives*: This section addresses the No Project Alternative and three alternatives which have been determined to meet the basic Project objectives and/or avoid or substantially reduce the Project's significant and unavoidable impacts;

these may be considered by the West Basin Board of Directors during Project deliberations.

These alternatives' impacts are analyzed for each environmental issue area, as examined in Sections 5.1 through 5.15 of this Environmental Impact Report (EIR). In this manner, each alternative is compared to the proposed Project on an issue-by-issue basis.

**TBR**

**7-3/2 7.1.2 Project Objectives** The Project objectives...as introduced in Section 3 are to:

1. Diversify West Basin's water source portfolio to increase **reliability** in the near and intermediate term...and the long term...while reducing **reliance** on imported water.
2. Improve water **security** through West Basin's increased local control of water supplies and infrastructure.
3. Improve West Basin's local control of **future water costs and long-term price stability.**



4. Improve **climate resiliency** by developing a water source that is **less susceptible** to **hydrologic variability**.  
5. Develop a potable water supply that is **economically viable and environmentally responsible**.  
**Define and provide quantitative analyses for Reliability, Reliance, Security, Stability, Resiliency, Susceptible, Variability, Viable, Economically, Responsible...**

WIL5-121

**7-6/1** 1. Potential to achieve at least **21,500 acre-feet per year (AFY)**...additional potable water supply  
2. **=O1+2**. Potential to contribute to **enhanced reliability** in the near, intermediate and long terms  
4. Legal and institutional **feasibility** (...allowable in California and **institutional obstacles can be overcome**)  
5. Physical siting requirements (site is of an appropriate size)  
8. Site availability  
6. **Proven technology**  
7. **=O3+5 Economic feasibility (i.e., that costs are clearly anticipated to not be exorbitant)**  
3. **=O1-5** Potential to meet the **majority of Project objectives**  
9. Potential to reduce impacts compared to the proposed Project  
**Provide throughout the DEIR consistent and publicly accessible flow units, MGD, with standard conversion from #1 MGD vs AFY 43560cf x 7.28 x 21500 / 365 58.904 19 MGD**  
**Provide listing of legal and institutional issues/obstacles, their feasibility, and allowable, e.g., #4-DPR.**

WIL5-122

**7-7/2** Since 1992,...implemented successful water conservation programs to reduce water demand within its **service area**.<sup>6</sup> ...Basin's eight retail agencies maintain and/or promote conservation programs which reduce water waste and manage demand, including passive conservation modifications to existing city ordinances pertaining to water use (West Basin 2016)...**Table 7-3** provides a listing of the programs West Basin administers and the level of participation of its retail customer agencies.

**TBR**

WIL5-123

**7-9/1** When comparing average water use by West Basin **retail agencies** during the period of 2006 through 2010, there was a 16 percent reduction in actual 2015 water use. When comparing 2015 actual water use with SBX7-7 GPCD targets, water use was below both the 2015 interim and 2020 GPCD targets for both the **West Basin Regional Alliance and other retail water agencies** in West Basin's service area.<sup>7</sup> As shown in **Figure 7-1**, its **service area's** historical water use, including Commercial, Industrial, and Institutional (CII) water use in GPCD has followed a downward trend despite an increasing population since 1990. The decline is a result of the long term conservation effort as well as the recycled water programs implemented by West Basin. Furthermore, the residential GPCD (R-GPCD) data (available since 2014) show that the current residential water use is very low for 2014, 2015, and 2016 at 97, 83, and 79 GPCD, respectively. These averages were lower than the average R-GPCD for South Coast by 24 percent, 10 percent, and 18 percent for the same years (SWRCB 2017).

**TBR**

WIL5-124

**7-13/2** Another factor....is the demographic and **economic makeup of West Basin's service area**. Several of West Basin **retail customer agencies have significant numbers of low income residents**. According to 2010 Census data,...residents living in the cities of Lomita and Inglewood are **below the federal poverty line**. Both cities have water use around or below 100 GPCD in 2015 and according to their individual 2015 UWMPs, both are projected to remain around the current number or lower in the future. The city of Hawthorne, another West Basin retail customer agency, has a total population of approximately 88,000 with 19 percent of its residents **below the federal poverty line** (2010 US Census). Low-income residential areas typically have very limited landscape and limited opportunities to save water without reducing to very low levels of indoor use. **Recent studies have found that the primary driver of water use in Los Angeles County is household income and there are clear differences in water use between more affluent areas and economically poorer areas (Mini 2013)**. This is evidenced by the **very low GPCD rates for all the cities** noted above. Specifically, during the recent drought, the City of Hawthorne reported to the SWRCB in June 2016 a residential GPCD of 62 (SWRCB 2016). This is just 12 GPCD above the minimum assumed health and safety level for indoor use (SWRCB 2016).

**TBR**

WIL5-125

**Include comparisons for Renters vs Owners.**

**7-13/3** The **reliance** on obtaining more water savings from **these low-income communities** that are already at **very low GPCD levels** may raise concerns over Environmental Justice issues....that "[w]hile this provision does not include the words 'environmental justice,' in certain circumstances, it can require local agencies to undertake the same consideration of **fairness in the distribution of environmental benefits and burdens**." Under the Increased Conservation Alternative **obtaining significantly more water conservation** from these **economically**

**disadvantaged communities** would impose an additional burden and would raise issues of fairness in water use requirements.

**Include comparisons for Owners vs Renters and Unit metering.**

WIL5-126

**7-14/2 Screening Criteria** Achieving additional conservation over the current 2015 UWMP projection in the amount contemplated under this alternative (21,500 AFY) would increase the risk of shortages since this alternative would require West Basin to depend on the actions of its retail water agency customers who in turn are relying on West Basin to maintain water supply reliability. As implementation of this alternative would largely fall upon West Basin's retail agencies, the reliability of this alternative would be largely outside of West Basin's control. According to the 2015 UWMP, the active and passive conservation programs currently in place are already anticipated to yield a conservation savings of approximately 42,773 AFY annually by the year 2040 (SWRCB 2016). There has been a significant level of demand hardening in West Basin's service area due to the industrial uses of recycled water, currently low consumption levels in lower income areas, and other factors.

**TBR**

WIL5-127

**7-16/3** ...City of Los Angeles published...(Stormwater Plan) to analyze the **cost-effectiveness** of stormwater capture (Geosyntech Consultants 2015)...estimates that the potential offset of imported water in the **city** of Los Angeles through stormwater capture is **1,000 AFY** by 2020 and **7,000 AFY** by 2035 based on the **city's** area of 503 square miles. Given that West Basin's service area is approximately 185 square miles, 63 percent smaller than the **city**, the stormwater capture potential is expected to be significantly lower than what the **City** has envisioned as accomplishable which would amount to a **fraction** of the 21,500 AFY amount necessary for an alternative to the Project.

**City/city refers to Los Angeles City use: City; use rainfall rather acres, AFY, Sq Mi, percentage; one foot of rain/yr x 1000sqf roof/house = x 44 houses = one acre-foot = 0.326 MGY...0.009MGD, Convert AFY to MGD**

WIL5-128

**7-19/1 AWT** for groundwater injection: 13,014 **AFY** (11.6 **MGD**)  
**Convert AFY to MGD.**

WIL5-129

**7-20/1** UWMP **anticipates** that future recycled water supplies and demand will increase as a result of planned system expansions, new applications, increasing public acceptance, and **financial incentives**.

**No references, no definition of "anticipates".**

**No definition of financial incentives and no analyses of financial analyses for the entire EIR.**

WIL5-130

**7-40/2** Develop a potable water supply that is **economically viable** and environmentally **responsible**: The No Project Alternative is inherently much more uncertain than the Proposed Project in its ability to develop a potable water supply that is **economically viable** and environmentally responsible....number of agencies that will participate **financially** in WaterFix and the **cost to member agencies of MWD** is **uncertain** at this time. Although WaterFix is intended to be environmentally **responsible**, current conflicts between SWP water operations and listed and threatened species continue to exist. Therefore, **continued dependence** on imported water supply would not **satisfy** this Project objective....

**Financial/economic/costs assessments and quantifications are totally incomplete, inadequate, and erroneous. Provide such for both Local and Regional Project elements.**

**No definition/quantification of viable, responsible, uncertain, dependence, and satisfy; provide such for both Local and Regional Projects and for comparisons of alternatives.**

**The EIR states that economics, finance, price, costs are part of the Project objectives but without any such info. Please provide a thorough Economic assessment as the Project Objectives and various points in the text and appendices.**

**Please include pricing and profitability for rate payers and ROI for each major service area (>10) and regional units.**

WIL5-131

2016 BCR Consulting 19-190098 pd-p.23 \*B12. References: McAlester and McAlester, A Guide to American Houses, 1991; City...Building Permits; County...Los Angeles Assessor's Office records; Historicaerials.com; El Segundo Power Generating Station website; NRG Energy Inc. website, **oral interview Eddie Daniel, employee.** [http://westbasindesal.org/assets/Documents%20and%20Files/Project%20Materials/draft-eir/appendices/Appendix\\_7A-Cultural\\_Resources\\_Assessment.pdf](http://westbasindesal.org/assets/Documents%20and%20Files/Project%20Materials/draft-eir/appendices/Appendix_7A-Cultural_Resources_Assessment.pdf)

**Provide PC transcript or remove**

WIL5-132

**Apdx.7B-2** References

Bickel, Polly McW., 1978, Sea Levels Along the California Coast: Anthropological Implications. The Journal of California Anthropology 5(1):6-20.

California State Lands Commission, California Shipwreck and Historic Maritime Resources Program, <http://www.slc.ca.gov/Info/Shipwrecks.html>, Accessed April 15, 2016.

**Reference provides only general accessibility without any relevant information.**

WIL5-133

Dibblee, T.W., and J.A. Minch, 2007, **Geologic map of the Venice and Inglewood quadrangles**, Los Angeles County, California. Dibblee Foundation Map DF-322, scale 1:24,000. Dibblee Geological Foundation.

**Reference provides geologic map without locating the project, not publicly accessible.**

WIL5-134

Erlandson, John M., 1985, Early Holocene Settlement and Subsistence in Relation to Coastal Paleogeography: Evidence from CA-SBA-1807. Journal of California and Great Basin Archaeology 7(1):103-109.

**Reference provides geologic map without locating the project, not publicly accessible.**

WIL5-135

**7B/3**

Jones, Terry, 1991, Marine-Resource Value and the Priority of Coastal Settlement: A California Perspective. American Antiquity 56(3):419-443.

Saucedo, George J., H. Gary Greene, Michael P. Kennedy, and Stephen P. Bezore, 2016, Geologic Map of the Long Beach 30' x 60' Quadrangle, California. California Department of Conservation.

Yerkes, R.F., T.H. McCulloh, J.E. Schoellhammer, and J.G. Vedder, 1965, Geology of the Los Angeles Basin – An Introduction. Geological Survey Professional Paper 420-A. US Geological Survey

**Reference provides geologic map without locating the project, not publicly accessible.**

WIL5-136

**9-1 SECTION 9** List of Preparers

**9.1 Project Sponsor/Lead Agency**

**West Basin Municipal Water District** 17140 So.Avalon Blvd., Suite 210 Carson, CA 90745

**9.2 Authors and Consultants**

**Environmental Science Associates (EIR Preparation)**

**Recommend: acquire more competent staff for biology, groundwater, water ditribution, and environmental justice**

WIL5-137

**5.6-11/1 Strong Seismic Ground Shaking**

Example Tables - SCEDC source.

Lat. 33.79917 Southerly 33.85611 Northerly x Lon. -118.42944 W -118.32472 E

#YYY/MM/DD HH:mm MAG LAT LON DEPTH km

<b>1933/03/13 04:39</b>	<b>3.37</b>	<b>33.85300</b>	<b>-118.35900</b>	<b>6.0</b>	
1933/09/03 00:36	1.76	33.82900	-118.33200	6.0	
1933/10/02 10:37	2.24	33.83583	-118.36933	6.0	
<b>1933/10/02 21:55:</b>	<b>3.05</b>	<b>33.83900</b>	<b>-118.33017</b>	<b>6.0</b>	
1933/10/03 23:42	2.47	33.83550	-118.39100	6.0	
<b>1933/10/04 10:24</b>	<b>3.21</b>	<b>33.80200</b>	<b>-118.39100</b>	<b>6.0</b>	
1933/10/19 01:53:	2.68 I	33.80667	-118.32500	6.0	
1933/12/14 12:32:	2.09I	33.79983	-118.35850	6.0	
<b>1935/01/22 09:28</b>	<b>3.27 I</b>	<b>33.82033</b>	<b>-118.39533</b>	<b>6.0</b>	
1935/04/18 22:13	2.22 I	33.84867	-118.40767	6.0	
1935/04/27 13:28	1.38	33.82600	-118.42500	6.0	
1936/11/30 01:33	1.93	33.80633	-118.33500	6.0	
1938/04/02 07:55	2.32 I	33.82033	-118.39400	6.0	
1938/04/20 01:58	2.75 I	33.83517	-118.39017	6.0	
1938/04/20 03:59	2.08 I	33.80200	-118.34417	6.0	
<b>1941/10/22 10:32</b>	<b>3.64 I</b>	<b>33.81950</b>	<b>-118.36433</b>	<b>0.0</b>	<b>Seaside 1.5mi east of shoreline</b>
1941/11/14 12:02	2.28 I	33.83217	-118.39367	6.0	
1944/06/19 07:28	2.96 I	33.85067	-118.36150	6.0	
1948/12/31 12:36	1.94 I	33.84700	-118.42100	6.4	
1955/02/23 14:28	2.38 I	33.82683	-118.33733	6.0	

WIL5-138

West Basin Desalination DEIR SCH # 2015081087

1960-----				
1976/04/13 13:33	2.18 h	33.82000	-118.39400	8.3
1977/10/07 21:39	2.10 h	33.81000	-118.33717	10.0
1977/10/13 00:00	1.99 h	33.83900	-118.40000	10.0
1978/04/30 21:50	1.80 h	33.81050	-118.40167	6.0
1983/01/05 11:48	1.24 h	33.83150	-118.34150	5.5
1984/04/14 13:12	1.60 n	33.84300	-118.35400	5.1
1985/11/18 22:14	1.95 c	33.84700	-118.34400	9.3
<b>1986/01/18 11:27</b>	<b>1.40 n</b>	<b>33.82300</b>	<b>-118.42900</b>	<b>1.2</b>
1986/11/20 11:20	1.72 c	33.83700	-118.33100	5.7
<b>1987/05/01 07:31</b>	<b>2.10 c</b>	<b>33.82400</b>	<b>-118.40000</b>	<b>2.0</b>
1988/02/23 05:37	1.95 c	33.82600	-118.39600	5.7
1988/03/03 07:59	1.91 c	33.80100	-118.34200	8.4
1988/04/06 22:44	2.09 c	33.81800	-118.34500	6.2
1988/09/04 23:16	1.70 h	33.84200	-118.36700	7.2
<b>1990/02/17 04:05</b>	<b>2.09 c</b>	<b>33.81000</b>	<b>-118.40400</b>	<b>2.8</b>
1990/07/04 02:08	2.02 c	33.80700	-118.36200	7.4
1990/11/25 11:24	2.49 c	33.85200	-118.36900	6.8
1991/04/20 00:58	0.40 h	33.84800	-118.41700	9.1
1991/04/20 01:07	2.65 l	33.84500	-118.42600	9.0
1991/05/16 16:00	1.93 c	33.81000	-118.37500	7.5
1991/12/02 05:09	2.50 c	33.83100	-118.41100	5.8
1992/08/11 12:58	1.83 c	33.80400	-118.32500	7.1
1992/08/12 22:30	1.94 c	33.85300	-118.42600	5.8
<b>1993/03/17 03:32</b>	<b>1.76 c</b>	<b>33.82600</b>	<b>-118.34300</b>	<b>-0.5</b>
1993/10/16 07:15	1.44 c	33.80700	-118.34300	7.5
1993/12/07 04:03	2.09 c	33.80200	-118.32500	6.1
1994/02/01 02:14	1.60 c	33.85400	-118.42400	11.1
1994/04/12 11:24	1.41 c	33.80400	-118.34400	8.3
1995/01/24 11:42	1.78 c	33.84100	-118.37800	12.6
1995/02/01 00:09	2.26 c	33.82800	-118.37200	8.7
1995/08/30 07:08	1.42 c	33.82200	-118.33800	9.8
1995/10/21 22:17	1.63 c	33.84900	-118.42000	5.3
1995/11/11 23:55	1.67 c	33.83700	-118.37000	13.3
1995/11/12 00:35	1.58 c	33.83200	-118.39600	13.8
1996/02/20 13:45	1.47 c	33.84400	-118.41900	11.0
1996/04/03 05:26	1.47 c	33.82800	-118.42200	6.1
1996/04/29 23:46	1.62 c	33.81800	-118.36800	8.6
1998/08/24 09:38	1.68 c	33.82300	-118.35100	5.7
1998/11/09 03:13	1.60 c	33.82500	-118.36000	5.2
1999/06/10 02:13	2.40 l	33.84700	-118.42000	14.1
1999/06/10 21:16	2.08 c	33.83800	-118.42300	4.8
2005/09/27 23:18	1.99 l	33.80017	-118.41250	14.7
2005/09/28 20:06	1.97 l	33.81050	-118.41000	14.7
2005/10/13 15:25	2.29 l	33.84133	-118.42867	11.7
2006/04/04 01:15	2.19 l	33.81017	-118.35883	15.3
2008/04/07 21:20	1.61 l	33.85250	-118.34083	5.9
2008/11/24 08:24	1.65 l	33.82700	-118.41367	13.6
2010/11/26 03:36	2.33 l	33.80983	-118.39033	10.2
2011/03/05 15:27	1.63 l	33.83750	-118.42433	17.3
2011/12/10 22:06	1.42 l	33.85550	-118.38867	15.4
2012/07/01 11:24	2.01 l	33.80083	-118.34667	9.6
2012/07/12 18:45	1.73 l	33.80183	-118.32633	7.6

WIL5-138

West Basin Desalination DEIR SCH # 2015081087

2014/04/05 09:22 1.47 | 33.84500 -118.36567 8.7

# Number of events: 73

**OFFSHORE**

#YYY/MM/DD HH:mm	MAG	LAT	LON	DEPTH
1932/10/21 15:26:04.48 eq	2.91	33.82583	-118.44333	6.0
1933/10/03 23:42:05.37 eq	2.47	33.83550	-118.39100	6.0
<b>1933/10/04 10:24:09.82 eq</b>	<b>3.21  </b>	<b>33.80200</b>	<b>-118.39100</b>	<b>6.0</b>
1934/12/08 18:28:38.58 eq	2.32	33.85733	-118.46083	6.0
<b>1935/01/22 09:28:47.50 eq</b>	<b>3.27  </b>	<b>33.82033</b>	<b>-118.39533</b>	<b>6.0</b>
1935/04/18 22:13:33.43 eq	2.22	33.84867	-118.40767	6.0
1935/04/27 13:28:08.54 eq	1.38 h	33.82600	-118.42500	6.0
1938/04/02 07:55:04.06 eq	2.32	33.82033	-118.39400	6.0
1938/04/20 01:58:19.72 eq	2.75	33.83517	-118.39017	6.0
1940/09/18 04:23:25.07 eq	2.54	33.84167	-118.45333	6.0
<b>1940/11/01 07:25:04.41 eq</b>	<b>4.18  </b>	<b>33.84283</b>	<b>-118.46467</b>	<b>6.0</b>
1940/11/01 13:20:26.75 eq	2.62	33.85400	-118.45250	6.0
*****4 mi offshore of RdB				
1941/06/11 13:26:56.40 eq	2.36	33.86150	-118.48383	6.0
1941/11/14 12:02:38.84 eq	2.28	33.83217	-118.39367	6.0
1948/03/23 01:25:52.16 eq	2.32	33.85217	-118.43950	6.0
1948/12/31 12:36:50.75 eq	1.94	33.84700	-118.42100	6.4
1949/07/10 04:26:02.16 eq	2.94	33.86550	-118.45017	6.0
1953/12/25 23:43:38.65 eq	2.94	33.86733	-118.41550	6.0
1956/09/20 20:15:14.53 eq	2.80	33.81833	-118.44067	6.0
1967/12/24 05:12:12.81 eq	2.51	33.85633	-118.49683	1.3
1972/11/24 07:13:40.79 eq	1.70 h	33.85083	-118.47900	10.5
1973/02/17 16:12:57.27 eq	1.70 h	33.81683	-118.45433	6.0
1974/10/30 02:24:38.21 eq	2.40 h	33.81583	-118.47083	5.0
1976/04/13 13:33:06.05 eq	2.18 h	33.82000	-118.39400	8.3
1977/03/13 20:53:29.47 eq	1.50 h	33.83833	-118.46350	0.3
1977/10/13 00:00:27.87 eq	1.99 h	33.83900	-118.40000	10.0
1978/01/17 21:22:57.73 eq	2.49 c	33.81950	-118.47500	0.0
1978/04/30 21:50:44.02 eq	1.80 h	33.81050	-118.40167	6.0
1980/04/14 11:53:06.73 eq	2.14 h	33.83667	-118.44217	6.0
<u>1980/09/22 04:37:25.57 eq</u>	<u>2.85  </u>	<u>33.83733</u>	<u>-118.44067</u>	<u>8.9</u>
<u>1980/09/22 04:41:10.12 eq</u>	<u>2.02  </u>	<u>33.84250</u>	<u>-118.46533</u>	<u>6.0</u>
1981/11/10 05:08:29.80 eq	1.98 c	33.85233	-118.44450	9.9
1981/12/30 09:43:59.47 eq	2.56	33.82550	-118.47783	4.4
1983/05/03 10:21:19.05 eq	1.80 h	33.84100	-118.48567	5.7
1983/06/05 07:47:18.24 eq	1.10 h	33.85883	-118.48900	3.4
1985/03/09 07:09:27.26 eq	1.93 c	33.82900	-118.49600	4.7
1985/03/11 16:21:49.45 eq	2.02 c	33.82000	-118.47400	5.3
1985/04/17 05:34:17.04 eq	2.24 c	33.86300	-118.49800	1.2
1985/08/16 12:09:25.23 eq	1.94 c	33.81900	-118.43800	3.8
1986/01/18 11:27:03.59 eq	1.40 n	33.82300	-118.42900	1.2
1986/04/24 11:04	1.50 n	33.84500	-118.48500	23.4
<b>1986/06/26 05:39</b>	<b>3.21  </b>	<b>33.86900</b>	<b>-118.45100</b>	<b>6.9</b>
<u>1986/06/26 20:35</u>	<u>2.08 c</u>	<u>33.85800</u>	<u>-118.44800</u>	<u>12.1</u>
<b>1986/10/11 19:17</b>	<b>2.26 c</b>	<b>33.86700</b>	<b>-118.46900</b>	<b>2.1</b>
<b>1987/05/01 07:31:16.38 eq</b>	<b>2.10 c</b>	<b>33.82400</b>	<b>-118.40000</b>	<b>2.0</b>

WIL5-138

West Basin Desalination DEIR SCH # 2015081087

1987/08/28 23:26:07.50 eq | 1.82 c 33.81500 -118.48400 11.1  
 1988/02/23 05:37:08.59 eq | 1.95 c 33.82600 -118.39600 5.7  
 1988/04/22 07:50:11.72 eq | 2.37 c 33.85700 -118.39300 3.8

**1988/09/12 13:24:34.20 eq | 4.04 | 33.86700 -118.45700 3.1\*\*\*\*\*1.5mile offshore**

1988/09/12 13:26:22.74 eq | 2.50 c 33.85100 -118.46200 5.8  
 1988/09/12 14:35:44.36 eq | 1.80 h 33.84667 -118.45050 14.1  
 1988/09/12 14:54:36.47 eq | 2.70 c 33.86100 -118.45900 3.1  
 1988/09/12 15:31:02.49 eq | 2.70 c 33.85800 -118.44700 4.8  
 1988/09/12 17:14:34.30 eq | 2.68 l 33.85200 -118.46900 5.7  
 1988/09/12 18:34:06.56 eq | 1.80 h 33.85200 -118.44100 9.7  
 1988/09/12 19:25:59.53 eq | 1.87 c 33.86100 -118.44600 6.8  
 1988/09/12 21:34:22.62 eq | 2.16 c 33.85800 -118.44200 7.9

1988/09/13 13:56:15.89 eq | 1.60 h 33.86000 -118.43900 5.8

1988/09/13 22:05:00.95 eq | 2.49 l 33.86500 -118.46200 3.0

118.441-469 33.867 - 847  
 844-848 417-445

1988/10/07 01:27:56.54 eq | 2.13 c 33.86200 -118.44900 5.6

1988/10/07 23:43:59.17 eq | 2.07 c 33.85800 -118.42800 9.9

1988/10/08 17:15:45.45 eq | 2.81 l 33.86300 -118.44500 5.6

1989/03/30 18:46:29.87 eq | 2.52 c 33.82900 -118.46300 5.9

1989/08/23 21:54:14.89 eq | 2.74 l 33.86700 -118.45100 7.7

1989/11/10 04:18:35.59 eq | 2.20 c 33.86200 -118.46600 8.4

1989/11/17 03:51:02.12 eq | 1.80 n 33.86200 -118.43700 5.0

1990/01/05 05:11:59.72 eq | 1.70 n 33.85700 -118.40000 5.1

**1990/02/17 04:05:37.23 eq | 2.09 c 33.81000 -118.40400 2.8**

**1990/02/20 02:01:09.51 eq | 2.06 c 33.83800 -118.43500 0.6**

1991/04/20 00:58:11.67 eq | 0.40 h 33.84800 -118.41700 9.1

1991/04/20 00:58:13.51 eq | 3.20 l 33.84500 -118.44500 6.0

1991/04/20 01:07:09.55 eq | 2.65 l 33.84500 -118.42600 9.0

1991/04/20 01:30:35.15 eq | 2.22 c 33.84400 -118.43100 8.6

1991/12/02 05:09:59.02 eq | 2.50 c 33.83100 -118.41100 5.8

1991/12/15 13:53:52.40 eq | 2.08 c 33.85900 -118.43900 8.6

1992/01/18 03:35:11.81 eq | 1.97 c 33.85700 -118.48500 9.2

1992/02/23 19:26:42.08 eq | 2.23 c 33.84900 -118.49900 7.8

**1992/06/27 18:30:44.67 eq | 2.24 c 33.84900 -118.43300 1.2 2 Miles offshore RB BrkWtr**

1992/08/12 22:30:20.78 eq | 1.94 c 33.85300 -118.42600 5.8

1993/05/22 22:28:14.95 eq | 2.43 c 33.85600 -118.44600 9.0

1993/06/12 18:06:56.42 eq | 2.63 l 33.85200 -118.45200 8.3

1993/09/25 12:28:55.73 eq | 2.22 c 33.86200 -118.42400 9.5

1993/10/28 06:52:27.38 eq | 2.05 c 33.86300 -118.44900 6.5

1994/02/01 02:14:42.60 eq | 1.60 c 33.85400 -118.42400 11.1

1995/10/21 22:17:10.23 eq | 1.63 c 33.84900 -118.42000 5.3

1995/11/12 00:35:00.57 eq | 1.58 c 33.83200 -118.39600 13.8

1995/11/15 00:09:17.24 eq | 2.05 c 33.85800 -118.42200 5.9

1996/02/20 13:45:41.92 eq | 1.47 c 33.84400 -118.41900 11.0

1996/04/03 05:26:32.90 eq | 1.47 c 33.82800 -118.42200 6.1

1996/09/09 15:26:13.61 eq | 1.86 c 33.81900 -118.46400 4.3

1997/05/19 20:31:54.52 eq | 1.58 c 33.86200 -118.39100 9.6

1997/11/13 14:46:04.47 eq | 1.99 c 33.81500 -118.45700 5.7

1999/03/09 00:05:07.41 eq | 2.15 c 33.83000 -118.43900 5.3

1999/06/10 02:13:19.09 eq | 2.40 l 33.84700 -118.42000 14.1

1999/06/10 21:16:46.37 eq | 2.08 c 33.83800 -118.42300 4.8

WIL5-138

West Basin Desalination DEIR SCH # 2015081087

1999/06/17 03:09:08.72 eq | 2.35 | 33.82300 -118.47600 8.8  
 1999/07/03 23:51:50.43 eq | 2.02 c | 33.80200 -118.45200 5.4  
 1999/08/28 13:30:33.75 eq | 2.35 | 33.84300 -118.48000 8.5  
 1999/09/08 08:19:16.95 eq | 2.31 | 33.83700 -118.45600 12.8  
 1999/09/17 16:33:41.24 eq | 2.26 | 33.82600 -118.45200 11.8  
 1999/10/13 21:52:15.07 eq | 1.80 c | 33.85500 -118.47300 5.3  
 2000/08/07 22:40:10.92 eq | 1.50 h | 33.85400 -118.45367 5.4

2002/05/23 07:46:47.07 eq | 2.47 | 33.82883 -118.49200 14.8  
 2002/06/08 18:46:48.18 eq | 1.96 | 33.86450 -118.45917 14.7  
 2002/07/24 14:29:40.25 eq | 2.11 | 33.81700 -118.45450 14.8  
 2003/04/21 08:15:58.85 eq | 1.82 | 33.82150 -118.47233 5.9  
 2005/02/14 14:29:56.07 eq | 2.23 | 33.85550 -118.47567 16.4  
 2005/02/19 04:28:52.46 eq | 2.10 | 33.83700 -118.49917 19.2  
 2005/09/27 23:18:56.94 eq | 1.99 | 33.80017 -118.41250 14.7  
 2005/09/28 20:06:40.08 eq | 1.97 | 33.81050 -118.41000 14.7  
 2005/10/13 15:25:17.48 eq | 2.29 | 33.84133 -118.42867 11.7  
 2005/11/22 21:53:49.00 eq | 1.83 | 33.83200 -118.44833 15.0  
 2006/12/04 14:19:33.27 eq | 2.76 | 33.81783 -118.43583 15.5  
2008/05/14 10:35:10.60 eq | 2.60 | 33.84300 -118.46650 12.6  
2008/05/14 10:38:36.29 eq | 1.67 | 33.83433 -118.44050 12.3  
 2008/11/24 08:24:16.95 eq | 1.65 | 33.82700 -118.41367 13.6  
 2009/06/02 12:17:32.95 eq | 1.64 | 33.81467 -118.45000 11.6  
 2010/03/29 18:20:47.90 eq | 2.35 | 33.86383 -118.49317 14.3

**2010/06/07 09:17                      3.53    33.85917 -118.44367 14.0**

2010/06/07 11:11:29.78 eq | 1.50 | 33.85400 -118.43933 14.1  
2010/06/07 11:51:39.54 eq | 2.10 | 33.84867 -118.46383 14.0  
2010/06/07 12:16:29.52 eq | 1.73 | 33.83517 -118.47033 19.0  
2010/06/07 18:17:48.01 eq | 2.25 | 33.86000 -118.44633 12.2  
2010/06/07 22:53:57.97 eq | 1.80 | 33.85650 -118.46000 13.4  
2010/06/07 23:59:19.72 eq | 2.32 | 33.83067 -118.46767 18.3

**2010/06/07 23:59                      3.69    33.85717 -118.45783 11.2**

2010/06/08 00:13:30.58 eq | 1.76 | 33.85350 -118.43850 12.6  
2010/06/08 00:17:05.27 eq | 2.68 | 33.85417 -118.46317 12.1  
2010/06/08 00:43:50.02 eq | 1.64 | 33.84583 -118.44433 16.7  
2010/06/08 00:53:07.16 eq | 1.84 | 33.84850 -118.45617 13.5  
2010/06/10 00:50:42.50 eq | 1.60 | 33.84783 -118.44367 15.6  
2010/06/10 00:50:55.54 eq | 1.69 | 33.83450 -118.45517 19.8  
2010/06/11 12:03:40.20 eq | 2.11 | 33.85033 -118.45317 13.6

2010/07/07 19:11:34.65 eq | 1.98 | 33.84950 -118.43983 15.1  
 2010/07/11 08:58:38.50 eq | 2.20 | 33.85167 -118.44617 11.3  
2010/07/11 17:55:06.25 eq | 1.68 | 33.85150 -118.45483 13.4  
 2010/09/02 20:32:04.61 eq | 2.45 | 33.85733 -118.45150 13.3  
 2010/11/11 11:27:44.77 eq | 1.97 | 33.83967 -118.44350 16.7  
 2010/11/26 03:36:58.94 eq | 2.33 | 33.80983 -118.39033 10.2

**2011/01/11 16:52                      3.03 | 33.85917 -118.45767 14.1**

2011/01/27 09:32:10.23 eq | 1.87 | 33.82017 -118.45367 9.2  
 2011/02/03 05:39:32.09 eq | 2.17 | 33.81250 -118.45333 13.0  
 2011/03/05 15:27:08.00 eq | 1.63 | 33.83750 -118.42433 17.3  
 2011/04/03 17:57:47.75 eq | 1.71 | 33.85200 -118.44417 11.3  
 2011/12/10 22:06:28.49 eq | 1.42 | 33.85550 -118.38867 15.4  
 2012/05/05 09:22:00.07 eq | 1.56 | 33.86917 -118.43883 12.7  
 2013/04/06 21:29:53.30 eq | 1.86 | 33.83717 -118.43050 9.7  
 2013/04/19 04:53:32.67 eq | 1.61 | 33.85017 -118.47583 12.9



WIL5-138

West Basin Desalination DEIR SCH # 2015081087

2013/12/22 10:55:48.78 eq | 2.47 | 33.85267 -118.46350 12.1  
2014/07/22 22:59:14.13 eq | 1.75 | 33.85067 -118.46100 15.4  
2015/07/21 01:52:29.97 eq | 2.82 | 33.81883 -118.47200 10.1  
2015/07/21 02:01:48.11 eq | 2.12 | 33.81817 -118.46783 9.0  
2017/09/21 01:06:25.55 eq | 1.40 | 33.86867 -118.41600 14.7  
2018/02/09 02:58:52.81 eq | 2.14 | 33.85617 -118.41667 13.5  
2018/03/18 14:00:31.45 eq | 1.45 | 33.85017 -118.46083 13.2



WIL5-138





# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Carol Wingate

Mailing Address 539 Richmond St, El Segundo 90245  
Street City State Zip

Telephone # (daytime) \_\_\_\_\_

E-mail Address cwingate322@yahoo.com

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

- ① The existing NRG plant provides tax income to the City of El Segundo. If that is decreased will the desalination plant provide income to the city? WIN-1
  - ② What consideration has been given to the city further industrialization of El Segundo's coastline. WIN-2
  - ③ Where will the plant get its energy? Who will profit from placing this plant here? WIN-3
  - ④ How much CO<sub>2</sub> and other pollutants will be released by this plant? WIN-4
  - ⑤ How will the additional salinity effect the plants and animals in the ocean? WIN-5
  - ⑥ Can the City of El Segundo rezone the property allowing a hotel that would produce income for the city? WIN-6
- OVER

To mail: fold, staple or tape together, and include a stamp.

⑥ How will the construction be funded? Where will the multi million dollar construction come from?

WIN-7

⑦ Why was this site chosen for this plant? Why not Palos Verdes or Redondo Beach?

WIN-8

⑧ Can the comment period be extended by another 30 days?

WIN-9

West Basin Municipal Water District  
Attn: Zita Yu, Ph.D., P.E., Project Manager  
17140 S. Avalon Blvd, Suite 210  
Carson, CA 90746

**From:** West Basin  
**Sent:** Tuesday, May 29, 2018 10:16 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

---

Comments - Form from West Basin Desal Site

**Name:** darryl woodcock

**Mailing Address:** 119 kelp street  
**City:** manhattan beach  
**State:**  
**Zip:** 90266

**Telephone # (daytime):** 4247810385

**Email Address:** kavaguy@gmail.com

**Organization:** individual member of the public

**Comments:**

any new plant should be placed as far away from residential areas as possible. the more northerly location is better if the plant is to be built at all failing that location then the redondo beach location should be used failure to properly monitor environmental quality over the past should be addressed and allowance made for trusted 3rd party monitoring..includes air, drinking water, ocean water, noise, any structures should be below surface and not visible seems like a waste of money in the intermediate term when better alternatives exist in the short term such as improved preservation, capture, efficient use/transportation of our water sources and transport mechanisms

WOO-1

Justin Sumi

From: West Basin <comments@westbasindesal.org>
Sent: Monday, June 25, 2018 4:22 PM
To: Noemi Luna
Subject: West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

Name: Colleen Young

Mailing Address: 318 Gull Street
City: Manhattan Beach
State: CA
Zip: 90266

Telephone # (daytime): 310-545-3597

Email Address: colleenyoun1@aol.com

Organization: Resident of Manhattan Beach

Comments:

Please take the time to read and consider all of my input and all of the comments you have received, as you are making a decision that greatly affects a lot of residents and communities in this projects path. The draft environmental impact report that has been produced is pretty clear, so here is a reminder if you need it at all. Your own report says the following: Anticipate significant environmental effects, direct, indirect, and cumulative environmental impacts of this project will occur in the following environmental areas: air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, transportation and traffic, noise, aesthetics, light and glare, terrestrial biological resources, marine biological resources, public services, utilities and service systems, recreation, land use and planning, cultural resources. Mitigation measures are necessary to minimize significant impact to hopefully lesser significant levels (where feasible (?), and who knows what where feasible is supposed to mean, possibly when cost effective?). The EIR concludes that there will be significant and unavoidable impacts related to air emissions during construction and increased noise during pile driving associated with the construction. Also, CEQA requires this NOA to specify if the project site contains any listed toxic sites. The project site is identified on the "Cortese List" as having potential for soil and groundwater contamination at the site from past uses on site and neighboring sites (well, there is ground contamination at both these sites, this is already known). Do we really need to say more than this to oppose such a project with so little accomplishment to the initial water problem? Yes? Well okay then, here it is: This desalination project does not meet your own laid out objectives to warrant this cost, destruction and harm to the area, communities, and the environment. Significant Community Impact Making a decision to place another environmentally damaging facility in a location just because there are numerous industrial type plants already existing and neighboring nearby in that area is nothing but ignorant to the communities who live and work here, if not an idiotic way as a means of making a decision. The 2 sites being looked at in this area are not 2 sites, but rather the same site (possibly 1500-2000 feet apart), with all of the same concerns and problems. There is no difference between one location and the other to our communities, and it should not be looked at in any other way. The disruption to our existing Manhattan Beach, El Segundo, and multiple other surrounding communities during and forever after with regard to our quality of life, noise, air, and ocean pollution is unforgiveable to place an unnecessary and overly expensive way of providing water to west basin ratepayers. There will be significant impact to our communities during construction onshore and offshore. Per your consultants there will be at peak construction time 100-110 trucks per day going in and out moving soil and using the roads and

YOCO-1
YOCO-2
YOCO-3
YOCO-4
YOCO-5
YOCO-6
17-240

**Comment Letter YOUNGC**

affecting traffic, noise, and air quality. Construction will probably take a minimum of 5 plus years to complete, and then the facility may possibly be expanded in the future, which would mean additional construction and ongoing disruption to the communities. Our communities will be exposed to the contaminated soil being moved by the wind, and by traveling through the neighborhoods. There is no way to mitigate this dust or exposing soil contamination with prevailing winds off of the ocean on a regular and daily basis. Virtually impossible to mitigate this soil contamination from becoming airborne and affecting the residents in surrounding and many other communities that it will travel through. This construction will also impose an economic impact on our community as people choose to relocate due to traffic disruption, and decide not travel to the cities to avoid the complications of traffic, noise, and the aesthetically displeasing construction. The ongoing facility usage will have a negative impact on close by communities with regard to ambient noise levels, light and glare, and the aesthetics and views to our surrounding areas. For some of us here, the increasing creeping and imposing industrial facilities surrounding us that are ever coming closer and narrowing our buffer zone, will definitely affect our property values and most of all our quality of life in our communities. Energy Inefficiency Seawater desalination is the most expensive and intensive energy consuming way of getting useable water, while completely ignoring the other less expensive and less intrusive ways of providing the water needed. This would be counter-productive to Californians way of life to save energy and preserve our natural environments and ocean. This energy intensive facility will also create additional global warming concerns for the area. You must practice what you preach, not only when it suits your needs and finances. Currently natural water runs by the billions of gallons out and into the ocean every time we get the rain in the winter months and is ignored, instead of looking at capturing the natural rain water provided to us, you want to build a facility that will take ocean water and make potable water instead of utilizing the existing water options available. Ignoring the other multitude of less expensive and more environmentally friendly and energy efficient options to solve the water problem is incomprehensible. Significant Environmental Impact The willingness to ignore the contaminated hazards in both of these locations at this site is unforgivable. Both sites in this location are contaminated from previous environmental facility blunders, and now you want to disturb the ground contamination to cause it to go airborne again to impact the residents of the close by and including farther communities. Digging the current soil hazards up and causing them to go airborne and then driving the contaminated soil debris through the cities to cause harm to millions of residents in the south bay area is unforgiving. There is no way to mitigate this hazard or harm with the blowing winds off of the ocean. Disturbing known contaminated soil areas to provide a facility that does not meet the objective or needs of the many is not a smart decision. We also truly do not know the effects any of the chemicals used in the desalination plant or the brine that is returned to our ocean water will have on our beaches, or the ocean water and marine life as we know it. Significant Financial Impact The cost of construction to provide this desalination plant is over the top to say the least. You have an already existing Hyperion facility which can also produce potable drinking water and is currently not doing so. How it can be justified to spend this kind of money on a desalination facility when there are already existing facilities not working to solve the water issues currently, however those plants have the capability of doing this, and ability to upgrade already existing infrastructure to accomplish this without the enormous cost of a new desalination plant along with the disastrous side effects to our communities and our environment. There is also an enormous negative impact financially to our communities as previously noted. This facility is costly in more than just financial ways. There are a multitude of other alternatives to provide water at this time without spending over a half a billion dollars on one facility to provide for so few in the west basin area. You must work together to combine resources and provide water with the entire state funding in mind; not divide projects without consent and understanding of other available options. The state is currently moving forward with plans of its own to build tunnels to transport water from other areas. In Summary You cannot in good faith vote for or look at the proposed enormously expensive, and not very efficient facility as a means to provide water to the west basin ratepayers. How do you plan to vote on this project without being able to answer the simple question of how much it will cost the ratepayers in the end, or the cost of the overall project and how it will be paid for if completed? This is not a testing ground for desalination proponents to move forward with their narrow vision and plan to make a profit off of ratepayers and residents. There are plenty of current desalination plants sitting idle that have not been capable of producing at a reasonable cost to provide water as promised. Look at the existing plants and you will in fact realize that desalination plants are not the answer to our water problems. I cannot come up with any good reasons for continuing on such a detrimental path to move forward with this desalination plant. Yes, you can ultimately get water, but there are so many other far better and more conscientious ways to accomplish that. If this project moves forward all of us can only assume it is about the fact that someone will get paid and profit from the construction of this facility. Thank you, Colleen Young, Manhattan Beach resident 318 Gull Street Manhattan Beach, CA 90266 310-545-3597 colleenyoung1@aol.com

- YOCO-6
- YOCO-7
- YOCO-8
- YOCO-9
- YOCO-10
- YOCO-11
- YOCO-12
- YOCO-13
- YOCO-14
- YOCO-15
- YOCO-16





# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Julie Young (formerly Manasti), SSA

Mailing Address 4418 Ocean Dr MB CA 90266  
Street City State Zip

Telephone # (daytime) 424-212-0651

E-mail Address jmanasti@gmail.com

Organization/Affiliation \_\_\_\_\_

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

My family and I own the following properties in  
 SF Porto: 4418 Ocean Dr, 4416 Ocean Dr, 208 42nd St  
 210 42nd St, 4212 The Strand, 4214 The Strand and  
 4213 Ocean Dr. My family lives in 4418 Ocean  
 (at the corner of 45th Street & Ocean Dr) YOJU-1

Our community is very concerned about the  
 proximity of the proposed sites. The South site  
 would literally be feet from us. The North site  
 is preferable, although we would prefer it not  
 to happen at all. My family and I surf daily and  
 are also very concerned about the effects on  
 our Ocean. Please describe the air quality and noise  
 considerations during construction ("significant and  
 unavoidable") and the length of time of construction. YOJU-2

Please describe the effects on the Ocean. Please describe how  
 North or South site will be determined. YOJU-3

To mail: fold, staple or tape together, and include a stamp.

**From:** Noemi Luna  
**Sent:** Wednesday, May 16, 2018 12:08 PM  
**To:** Justin Sumi  
**Cc:** Jennifer Lao  
**Subject:** Fwd: West Basin Desal Site Comments

---

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

WB comment.

Noemi Luna

Project Manager

MBI / 626-967-1510

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**From:** West Basin <comments@westbasindesal.org>  
**Sent:** Wednesday, May 16, 2018 11:06:24 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

Comments - Form from West Basin Desal Site

**Name:** CHAD ZANI

**Mailing Address:** 836 MANHATTAN AVE  
**City:** HERMOSA BEACH  
**State:** CA  
**Zip:** 90254

**Telephone # (daytime):** 3102277163

**Email Address:** chad.zani@gmail.com



**Organization:** Surfer

**Comments:**

I grew up in Perth Western Australia - and still cant believe how much water is being wasted in LA and Southbay. In Perth there are no public urinals that flush, or in any bar or restaurant. Billions of gallons could be saved if you introduce this now - and you wont have to build a desal plant that will destroy the bay - just like it destroyed Cockburn Sound in Western Australia. The salty brine that gets dumped sinks to the ocean floor and kills everything!!! Until you stop doing everything you can like wasting water when any man uses a urinal - this is a colossal waste of time money and it will destroy the environment.

ZAN-1



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Dr. Lori ZAREMSKI

Mailing Address 3221 Gibson place Reelando Beach  
Street City State CA 90278

Telephone # (daytime) 310 408 6908

E-mail Address drloriz@aol.com

Organization/Affiliation Concerned Citizen

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

How does the possible financial gain to individual Water District members affect their voting. Is possible conflict of interest of District board investigated?

ZAR-1

To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) DR. LOEY ZAREMSKI

Mailing Address 3221 GIBSON PLACE, REDONDO BEACH, CA 90578  
Street City State Zip

Telephone # (daytime) 310 408 6908

E-mail Address drloeyz@aol.com

Organization/Affiliation Self - Concerned Citizen

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

Creating another environmental man-made disaster to poorly address another man made crisis (drought & insufficient water supply) due to poorly planned development in the California desert is peckless

start sighted

ZAR2-1

To mail: fold, staple or tape together, and include a stamp.



# West Basin Municipal Water District Ocean Water Desalination Project

## Comment Card

This form may be used to submit comments on the Draft Environmental Impact Report (EIR) for the proposed West Basin Municipal Water District Ocean Water Desalination Project.

Name (print clearly) Dr. Lori ZAREMSKI

Mailing Address 3221 Gibson place Reelando Beach  
Street City State CA 90278  
Zip

Telephone # (daytime) 310 408 6908

E-mail Address drloriz@aol.com

Organization/Affiliation Concerned Citizen

Please provide comments in the section below and leave in comment box or place in mail by Friday, May 25, 2018 at 5:00 PM.

I have the following comments on the Draft EIR for the proposed Ocean Water Desalination Project (please print and use additional sheets if necessary):

How does the possible financial gain to individual Water District members affect their voting. Is possible conflict of interest of District board investigated?

ZAR2-2

To mail: fold, staple or tape together, and include a stamp.

**Comment Letter ZUANICH-FERRELL**

**From:** West Basin  
**Sent:** Thursday, April 26, 2018 11:50 AM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Jacqueline Zuanich-Ferrell

**Mailing Address:** 1018 Duncan Avenue  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3107482181

**Email Address:** jzuanichferrell@yahoo.com

**Organization:** Resident of Manhattan Beach

**Comments:**

I am in favor of this project to ensure a steady supply of clean drinking water to our area!

┌  
ZUA-1  
└

**Comment Letter ZUANICH-FERRELL2**

**From:** West Basin  
**Sent:** Wednesday, June 20, 2018 1:04 PM  
**To:** Noemi Luna  
**Subject:** West Basin Desal Site Comments

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Comments - Form from West Basin Desal Site

**Name:** Jacqueline Zuanich-Ferrell

**Mailing Address:** 1018 Duncan Ave  
**City:** Manhattan Beach  
**State:** CA  
**Zip:** 90266

**Telephone # (daytime):** 3107482181

**Email Address:** Jzuanichferrell@yahoo.com

**Organization:**

**Comments:**

I am in favor of a desalination plant to ensure supplies of water in the future.

┌ ZUA2-1  
└

## Response to Letter ABD: Diego Abdelnur

### Response ABD-1

The comment restates conclusions presented in the Draft EIR Section 5.11, *Marine Biological Resources*. This comment does not address 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.

### Response ABD-2

An important part of the CEQA process is producing and including a Mitigation Monitoring and Reporting Plan as a condition of Project approval that specifies the mitigation measures that are required to be implemented as part of the proposed Project, which entity will implement them, and which enforcement agency will be responsible for ensuring they are implemented correctly and meet the established performance standards. Marine biological resources mitigation measures, as identified in Section 5.11 on the Draft EIR (Mitigation Measure Bio-2), will be included in the Mitigation Monitoring and Reporting Program (MMRP) if and when the Project is considered for approval. In addition, West Basin will have to apply for, and the Los Angeles Regional Water Quality Control Board (LARWQCB) will need to issue, a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of brine. The NPDES permit will include thresholds, conditions and monitoring requirements. If monitoring demonstrates the Project discharge does not meet the permit thresholds, West Basin will need to remedy the situation, or stop discharging brine.

## Response to Letter ADA: Gladi Adams

### **Response ADA-1**

Impacts to marine biological resources are presented in the Draft EIR Section 5.11, *Marine Biological Resources*. West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. However, the expansion of an existing conservation program does not meet the objective of diversification. The proposed Project is intended to address water supply reliability and a reduced reliance on imported water (Draft EIR page 3-3). This comment does not address 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. Please see also *Master Response: Water Supply Alternatives*



## Response to Letter AFF: Jane Affonso

### **Response AFF-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. The commenter is referred to: *Master Response: Non-CEQA Issues*, *Master Response: Greenhouse Gas Emissions and Energy*, *Master Response: Cost and Rates*, and *Master Response: Water Supply Alternatives*.

### **Response AFF-2**

This comment expresses an opinion and does not speak to the adequacy of the Draft EIR; see *Master Response: Non-CEQA Issues*.

## Response to Letter AHE: Grant and Lynn Ahearn

### **Response AHE-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*. The commenter is also referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.

## Response to Letter ALV: Jose and Liz Alvarez

### **Response ALV-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*. The commenter is also referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter ANO: Anonymous

### **Response ANO-1**

The commenter is referred to *Master Response: Water Supply Alternatives* and *Master Response: Non-CEQA Issues*.

## Response to Letter ARE: Karen Arensdorf

### **Response ARE-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 to Letter ASH: Aida Ashouri

### Response ASH-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. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period. The commenter's letter dated June 25, 2018, is included in response to comments ASH-2 through ASH-8.

### Response ASH-2

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*. Regarding air quality and greenhouse gas emission impacts, the commenter is referred to the Draft EIR Subsection 5.2.4 and 5.7.4.

### Response ASH-3

Refer to *Master Response: Non-CEQA Issues*. While land value and quality of life are beyond the scope of the Draft EIR, it is noted that the existing power generating stations at the ESGS North Site have been decommissioned. And if the proposed Project were to proceed, and the ESGS North site were to be selected, the power generating stations would be demolished and removed. Moreover, the Draft EIR's Section 6.3, *Environmental Justice*, considers the potential for the Project to have a disproportionate adverse effect on minority and low-income populations (pages 6-9 through 6-14). The commenter is referred to *Master Response: Environmental Justice* (see also Final EIR Section 18).

### Response ASH-4

As explained in the Project objectives of 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). The need for 21,500 AFY equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in UWMP Table 5-5. This is a clearly stated proposal for water supply diversification. The 20,342 AF multi-dry year event 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 by 2020 and 21,500 AF 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. The Draft EIR evaluates alternatives to desalination, as described in EIR Subsection 7.2.1. See also *Master Response: Water Supply Alternatives*.

### **Response ASH-5**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* for a discussion traffic, air quality pollution, and aesthetics impacts to neighboring communities. For impacts to property values, see *Master Response: Non-CEQA Issues*.

### **Response ASH-6**

The commenter is referred to Section 5.14, *Recreation*, which concludes that the proposed Project would not deteriorate nearby recreational facilities, either during construction or operation.

The commenter is referred to Section 5.11, *Marine Biological Resources*, which explains that the proposed Project would result in less than significant impacts to marine resources.

The commenter is referred to Section 7, *Alternatives to the Proposed Project*, which includes an evaluation of Project alternatives considered in the Draft EIR.

### **Response ASH-7**

The purpose of the EIR is to analyze how construction and operation of the proposed Project may impact the environment, including air quality. The Draft EIR provides this analysis in Section 5.2, including a discussion on the National Ambient Air Quality Standards. Prevention of Significant Deterioration referenced in the comment is a federal Clean Air Act permit process required for major point sources. The Draft EIR concludes (as summarized in Table 5.2-8) that construction would result in emissions of NO<sub>x</sub> above South Coast Air Quality Management District (SCAQMD's) published significance thresholds even after all feasible mitigation measures are applied, but that the operation of the proposed Project would conform with the federal Clean Air Act. For all significant impacts, a statement of overriding consideration is required prior to approval of the Project. Prior to operating the new facility, point source air permits may be required to ensure that the emissions conform to local air quality protection plans. The proposed Project would not be considered a Major Stationary Source since most of the emissions would be associated with off-site energy generation. The permitting process for on-site emissions sources such as emergency generators would be conducted with the SCAQMD. The proposed Project

would be subject to all conditions imposed by the SCAQMD to ensure that the on-site point source emissions conforms to air quality regulations and improvement plans.

### **Response ASH-8**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Non-CEQA Issues*, and *Master Response: Water Supply Alternatives*. The comment does not identify any specific 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 warranted.



## Response to Letter BAC: Laura Bachelder

### Response BAC-1

The Draft EIR analysis pertaining to salinity and water quality is found in Section 5.9, *Hydrology and Water Quality*, and the analysis pertaining to marine biological resources is found in Section 5.11, *Marine Biological Resources*. As discussed in detail in Draft EIR Subsection 5.9.4 (page 5.9-54), although the reverse osmosis (RO) treatment process would result in the discharge of increased concentrations of salinity and other constituents associated with Santa Monica Bay source waters within a localized area around the diffuser, the total loading of constituents being discharged into Santa Monica Bay would not be increased above existing conditions. The assessment of impacts on water quality from the discharge of brine, from the proposed Project, incorporates the numeric thresholds defined in the Ocean Plan for determining impacts from operation of the Local and Regional Project. Specifically relating to salinity, as described in detail under Impact 5.9-2 (Draft EIR Subsection 5.9.4), the California Ocean Plan limits the increase of salinity of receiving water from desalination plant discharges to a daily maximum of 2 parts per thousand (ppt) above natural background salinity at the boundary of the Brine Mixing Zone (BMZ), defined as the horizontal distance of 100 meters (328 feet) from the point of discharge. As presented in Table 5.9-6 and 5.9-8 (see response to comment LARWQCB-30 for further discussion relating to supplemental studies and revisions to the Draft EIR), the Local Project would meet the Ocean Plan salinity standard between 45 and 63 feet from the point of discharge, and the Regional Project would meet the Ocean Plan salinity standard between 70 and 98 feet for all scenarios modeled; well within the Ocean Plan limit of 328 feet. And as discussed in Subsection 5.11.4, the proposed Project's impacts from construction or operation activities would be less than significant, or less than significant with mitigation.

The comment about the proposed Project being located “so close to LA depuration [sic] system” is unclear. The proposed facilities analyzed as part of this Project are separate and distinct from other nearby water treatment facilities. This comment does not address 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.

## Response to Letter BAR: Bart Barisa

### Response BAR-1

The comment's suggestion of building two desalination plans instead of one, to account for catastrophes such as earthquakes and terrorism, is noted by West Basin. The purpose of an environmental impact report and review under the California Environmental Quality Act (CEQA) is to assess the potential impacts of a project on the environment. Impacts of the proposed Project on geologic conditions such as earthquakes are addressed in the Draft EIR in Section 5.6, *Geology, Soils and Seismicity*. Although West Basin appreciates the concerns raised, the comment about terrorism falls outside the purview of CEQA. The commenter is referred to *Master Response: Water Supply Alternatives* and *Master Response: Non-CEQA Issues*.

### Response BAR-2

The comment's statement about rain is noted for the record; West Basin is proposing the Project in order to increase water supply reliability to account for drought and other conditions. Please also see *Master Response: Water Supply Alternatives*.

## Response to Letter BAUJ: James Baumann

### Response BAUJ-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter BAUL: Liane Baumann

### Response BAUL-1

The proposed Project would construct a light industrial structure on coastal property that has historically been developed with power generating facilities. Replacement of portions of those facilities would soften the views compared to the existing heavy industrial character. The Draft EIR evaluates aesthetic impacts of the proposed Project in Section 5.1, *Aesthetics, Light & Glare*, on pages 5.1-9 through 5.1-29-. Land use impacts are discussed in Section 5.10, *Land Use and Planning*, on pages 5.10-14 through 5.10-37. The need for the Project is discussed in Section 2.3, *Introduction*, on page 2-3. Project Alternatives are discussed in Section 7. The comment to locate the Project on an inaccessible beach elsewhere is speculative and unspecific. No feasible alternative locations are suggested. The Project would be located on industrially zoned land and would be collocated at the NRG gas generating station, which is an existing industrial use. See *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter BECB: Bill Becker

### **Response BECB-1**

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*.

## Response to Letter BECR: Richard Becker

### Response BECR-1

As noted in Draft EIR Section 5.6, *Geology, Soils, and Seismicity*, given the state's susceptibility to seismic events, the California Building Code (CBC) seismic standards are among the strictest in the world and deal with structural design requirements governing seismically resistant construction (Section 1604), including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Draft EIR Section 5.9, *Hydrology and Water Quality*, addresses the issues of tsunamis and sea level rise. See also the description of the supplemental Coastal Hazards Analysis in *Master Response: Supplemental Studies*.

## Response to Letter BES: Paul Beswick

### Response BES-1

This comment expresses an opinion, presents the commenter's qualifications, and does not comment directly on the adequacy on the Draft EIR. See *Master Response: Non-CEQA Issues and Master Response: Water Supply Alternatives*.

### Response BES-2

Draft EIR Subsection 7.2.1 considered a range of alternatives, including increased conservation, stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse. See Draft EIR Table 7-1 and *Master Response: Water Supply Alternatives*.

### Response BES-3

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 Water District of Southern California's (MWDs) 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 BES-4

Regulations do not currently exist that would allow for Direct Potable Reuse (DPR) within the West Basin service area. However, as currently envisioned, future DPR regulations may specify a blending requirement, where highly treated water would be blended with potable water for treatment prior to distribution. Interestingly, the implementation of the proposed Project may position West Basin to support future DPR through use of the desalinated ocean water as a raw water source for blending when such regulations are in place. West Basin supports development of DPR as a part of a diversified water supply portfolio for the region. Development of the ocean water desalination would strengthen West Basin's ability to implement DPR in the future via raw water augmentation.

### Response BES-5

Draft EIR Sections 1.2, *Executive Summary*, and 3.3, *Project Description*, explain that 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). The Draft EIR evaluates a range of alternatives to desalination, as described in EIR Subsection 7.2.1. See also *Master Response: Water Supply Alternatives*. However, as noted throughout the Draft EIR, West Basin continues to develop these other water supply alternatives in addition to ocean water desalination, representing a responsible, diverse, and balanced water supply portfolio.

The Draft EIR evaluates the potential environmental impacts of the proposed Project's construction and operation throughout Section 5. Section 5.1, *Aesthetics*, concludes that the

impact of the proposed Project on scenic views and vistas, and visual character of the Project site and surrounding area would be less than significant with mitigation. There would be no impact on scenic resources. While the Draft EIR notes in Section 3.2 that the proposed Project would replace the ESGS Units 3 and 4, Draft EIR Subsection 2.10.11 notes that Units 5, 6 and 7 will remain on-site. The proposed Project, as a light industrial facility, would be located among the array of existing heavy industrial facilities along this part of the Santa Monica coastline.

Regarding the commenter's position opposing the Project, see *Master Response: Non-CEQA Issues*.



## Response to Letter BOO: Peter Boone

### **Response BOO-1**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.

## Response to Letter BOR: Frank Boroch

### **Response BOR-1**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter BRAD: Theresa Brady

### Response BRAD-1

A discussion of greenhouse gas (GHG) emissions impacts from construction and operation of the proposed Project are discussed in detail in Section 5.7, beginning on page 5.7-19. The Draft EIR discloses the total GHG emissions impact for the proposed Project and includes mitigation measures to ensure that West Basin reduces and/or offsets the Project's emissions to a significance threshold of net carbon neutral. This means that the proposed Project's net increase in GHG emissions over the emissions associated with an equivalent volume of water that would have been supplied by Metropolitan Water District of Southern California (MWD) for the Project would be 100 percent offset through a combination of Project design features and mitigation measures. Therefore, the construction and operation of the proposed Project would not increase the amount of greenhouse gas emissions above current levels and would, therefore, not contribute significantly to climate change. The proposed project's on-site operational emissions would be limited to natural gas emissions at the administration building as noted in Table 5.2-12. See *Master Response: Greenhouse Gas Emissions and Energy Use*.

### Response BRAD-2

Draft EIR Subsection 7.2.1 provided an in-depth analysis on West Basin's current planning efforts to increase recycled water. As noted in the analysis, the expansion of West Basin's Recycled Water Program would increase capacity from 40 million gallons per day (MGD; current capacity) to 70 MGD of secondary effluent. The amount of secondary effluent water from Hyperion to be provided to West Basin would be limited to 54 MGD with the remainder (16 MGD) going into the City of Los Angeles' Harbor Area under the current agreement (City of Los Angeles 2018) to upgrade Hyperion (70 MGD in total). With the City of Los Angeles's current partnership with Water Replenishment District to evaluate the potential use the rest of the Hyperion wastewater effluent to produce recycled water for groundwater replenishment purposes, the likelihood for West Basin to receive secondary effluent beyond 54 MGD is unlikely and speculative. West Basin currently recycles approximately 40 MGD of secondary effluent from Hyperion that makes up for the total existing customer demand within West Basin's service area. However, West Basin is committed to expand its effort to improve water quality that would attract more recycled water customers and increase future demand to 54 MGD. West Basin is also committed to work with other regional partners, such as Metropolitan Water District of Southern California (MWD), to develop ways to maximize the utilization of West Basin's recycled water distribution and treatment systems to further increase recycled water use in the region. Even expanding the recycled water production from Hyperion Water Reclamation Plant to its full capacity would not eliminate imported water demands, nor would it eliminate the need for additional water supply diversification afforded by ocean water desalination.

West Basin is also committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. However, the expansion of an existing conservation program does not meet the objective of water supply diversification, and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought. See *Master Response: Water Supply Alternatives*.

### **Response BRAD-3**

Composting toilets in homes throughout the West Basin service area, from Malibu to Palos Verdes, could indeed save thousands of gallons of water per year. Unfortunately, until the study is completed in or around 2020, the concept would be speculative and not yet ripe for consideration as an alternative to the proposed Project evaluated in this Draft EIR.

### **Response BRAD-4**

How any one retail customer conserves water in the home is an individual choice. Choices may be behavioral (taking shorter showers) or require hardware changes (installing a composting toilet). But the need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in UWMP Table 5-5. The 20,342 AF multi-dry year event 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 2010 and 2015 UWMP Table ES-3). However, the expansion of an existing conservation program does not meet the objective of water supply diversification, and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought.

### **Response BRAD-5**

To maximize the reliability of the San Diego region's water supplies, the San Diego County Water Authority is executing a long-term strategy to diversify its water sources, make major investments in the region's water delivery (including desalination) and storage system, and improve water use efficiency. In a May 2017 poll of its customers, two-thirds (67 percent) of respondents said water is a good or excellent value compared to other utilities. While CEQA does not consider the cost of a project to be an environmental impact, prohibitive costs can be used to determine that a project alternative is infeasible. See also *Master Response: Cost and Rates*.

### **Response BRAD-6**

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. The commenter is referred to *Master Response: Non-CEQA Issues*, *Master Response: Greenhouse Gas Emissions and Energy*, *Master Response: Cost and Rates*, and *Master Response: Water Supply Alternatives*. The commenter is also referred to Section 5.11, *Marine Biological Resources*, for a discussion of environmental impacts related to sea life.

### **Response BRAD-7**

The attachments provided by the commenter are noted for the record.

## Response to Letter BRAI: Samuel Braitman

### **Response BRAI-1**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter BRAU: Bonnie Braunecker

### **Response BRAU-1**

The commenter is referred to *Master Response: Water Supply Alternatives*. The commenter is also referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter BRAU2: Bonnie Braunecker

### Response BRAU2-1

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*. The commenter is also referred to *Master Response: Cost and Rates*.

### Response BRAU2-2

The Draft EIR Subsection 7.2.1 evaluates a range of water supply alternatives, including recycling, and explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production at the Hyperion Water Reclamation Plant to its full capacity 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. The need for 21,500 AFY equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in West Basin's 2015 Urban Water Management Plan (UWMP) Table 5-5 and 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). See *Master Response: Water Supply Alternative*.

## Response to Letter BRI: Niklas Bringleston

### Response BRI-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

The community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.



## Response to Letter BUE: Michelle Bueltel

### Response BUE-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter CHA: Peter Chang

### **Response CHA-1**

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Water Supply Alternatives*.

## Response to Letter CHR: D. Christopher

### **Response CHR-1**

While large scale air to water generators could produce 1,320 gallons per day (<http://www.watergen.com/products/>), they are generally designed to meet the needs of villages, factories and off-grid settlements. They would not meet West Basin's goal 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), and would not be sufficient to offset the need for 20 million gallons per day.

## Response to Letter CLA: Ben Clayton

### **Response CLA-1**

West Basin’s goal 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, is consistent with goals for desalinated ocean water supplies identified in West Basin’s 2015 Urban Water Management Plan (UWMP). The need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in UWMP Table 5-5 and 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).

## Response to Letter COC: Brian Cochran

### **Response COC-1**

The West Basin Board of Directors has the authority to certify the Environmental Impact Report (EIR) and to consider approval of the Project. The names and contact information for each board member can be found here: <http://www.westbasin.org/board-directors>.

## Response to Letter COC2: Brian Cochran

### **Response COC2-1**

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter COHJ: Julia Cohen

### **Response COHJ-1**

The West Basin Board of Directors has the authority to certify the EIR and to consider approval of the Project. The names and contact information for each board member can be found here:

<http://www.westbasin.org/board-directors>.

No elected officials were present at the Draft EIR public meeting held on April 25, 2018.

## Response to Letter COHS: Stephen Cohen

### **Response COHS-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*. The commenter is also referred to *Master Response: Water Supply Alternatives*.



## Response to Letter CON: Terry Constant

### Response CON-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved. It should be noted that the North Site is not located near the Hyperion Plant. The commenter is referred to *Master Response: Non-CEQA Issues* and *Master Response: Water Supply Alternatives*.

## Response to Letter CROC: Renee Croce

### Response CROC-1

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*.

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter CROF: Amy Croft

### **Response CROF-1**

The commenter is referred to Section 7, *Alternatives to the Proposed Project, Master Response: Water Supply Alternatives*, and *Master Response: Non-CEQA Issues*.

## Response to Letter CUN: Glenn Cunningham

### Response CUN-1

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*.

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

See also *Master Response: Environmental Impacts to the El Porto Community*.

### Response CUN-2

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.

Lighting impacts are discussed in the Draft EIR on pages 5.1-25 through 5.1-29. Mitigation measures are identified to reduce light and glare impacts including preparation of a Construction Safety Lighting Plan (AES-5) and an Outdoor Lighting Plan (AES-6) to ensure that construction and operational lighting is aimed away from residential areas and light does not spill on to residential use.

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." 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. See *Master Response: Environmental Impacts to the El Porto Community*.

### Response CUN-3

The purpose of the EIR is to document West Basin's evaluation of the potential environmental impacts of the proposed Project on the environment, and to inform its Board of Directors' consideration of whether or not to approve the Project and direct staff to pursue permitting for it. As a CEQA lead agency, West Basin has the authority to certify that the evidence is sufficient to determine the environmental impacts of the proposed Project. The Coastal Commission is responsible for determining compliance of the Project with the Coastal Act and will do so during its review of West Basin's application for a Coastal Development Permit.

### Response CUN-4

As discussed on page 5.12-25, the closest residential uses are located approximately 130 feet south of the construction area on the ESGS site. At this distance, vibration levels from pile driving would range between 0.014 and 0.128 in/sec peak particle velocity (Table 5.12-13). This is below the levels that could result in architectural damage to nearby residential structures or result in annoyance. Table 5.12-7 identifies that construction vibration damage can occur to buildings extremely susceptible to vibration at 0.12 in/sec. In California where construction is subject to seismic forces, this type of construction is not allowed for habitable structures. Table 5.12-7 notes that engineered structures would be susceptible to damage at levels exceeding 0.3 in/sec. which is well above the maximum range identified in Table 5.12-13. Local residences within 130 feet of the South Site Alternative construction area may experience slight vibration, but would not result in a substantial annoyance or structural damage. Furthermore, construction activities would only occur during the day time when residential receptors would be less sensitive to the effect. Impacts from vibration on local residences would be less than significant.

## Response to Letter DAV: Thomas Davidov

### Response DAV-1

As explained in the Project objectives of 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). The Draft EIR Subsection 2.3.2 on page 2-14 discusses the 2015 UWMP and details how West Basin proposes to manage its water supplies and demands under all hydrology conditions, and demonstrates how West Basin proposes to meet its service area's wholesale demands and provide long-term water reliability over the next 25 years. The need for 21,500 AFY equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in UWMP Table 5-5 and 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).

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 *Master Response: Water Supply Alternative*

## Response to Letter DEF: Victoria Lynn DeFrank

### Response DEF-1

All environmental impacts, including those to the local community and region, are identified throughout the Draft EIR Section 5.1 through 5.16.

### Response DEF-2

As part of the Project planning efforts, West Basin prepared preliminary cost estimates for the proposed Project that are included in the Ocean Water Desalination Program Master Plan prepared in 2013. This cost estimate is available on the District's website:

[http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan\\_PMP%20Vol%20I%20\(2013\).pdf](http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan_PMP%20Vol%20I%20(2013).pdf)

These preliminary cost estimates provide a planning-level range of total Project costs that include costs for constructing the treatment facility (including the offshore intake and discharge modifications) and the product water distribution system as well as annual operations and maintenance costs. These preliminary estimates provide a sense for the ultimate scale of the costs, but present a wide range to account for uncertainty. As the Project design is refined, including permitting and mitigation commitments, actual Project costs will also become more refined. West Basin has initiated a more refined cost estimate and rate study for the proposed Project that is expected to be completed in 2020. See also *Master Response: Cost and Rates*. West Basin proposes to build and operate the facility, and the cost of operations would be recovered through rates. Draft EIR Section 5.1, *Aesthetics*, addresses the potential for the Project to result in impacts on the existing visual environment (less than significant with mitigation). Section 5.14, *Recreation*, addresses potential impacts on recreation resources: The Project would not result in loss of beach access.

### Response DEF-3

Responses to all comments received on the Draft EIR are included herein. See also *Master Response: Cost and Rates*.

## Response to Letter DEL: Patricia Delk

### Response DEL-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.



## Response to Letter DOD: Clinton Dodd

### **Response DOD-1**

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*.

## Response to Letter DOL: Dina Doll

### Response DOL-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter DUN: Lesley Dunlap

### Response DUN-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Water Supply Alternatives*.

## Response to Letter DUN2: Lesley Dunlap

### **Response DUN2-1**

While West Basin appreciates the comment, it expresses an opinion and does not speak to the adequacy of the Draft EIR. As a result, this comment has been noted for the record and no further response is necessary. See response to comment DUN-1, and *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter EVE: Conner Everts

### Response EVE-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. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period.

### Response EVE-2

In response to this and other comments requesting an extension, West Basin granted a 31-day extension for review and comment on the Draft EIR, providing a 91-day public review period.

### Response EVE-3

West Basin thanks the commenter for their reflection on the staff engagement at the Draft EIR public meeting.

### Response EVE-4

While West Basin collected comment cards at the Draft EIR public meetings, the meetings were not recorded. All comments offered at the public meeting were responded to at the public meeting by the West Basin and consultant staff. West Basin staff urged commenters to submit written comments on the Draft EIR so that the Board of Directors has a clear record upon which to make a decision on whether or not to approve the Project. This Final EIR contains all written comments received, and responses to those comments.

## Response to Letter FEA: Sarah Feakins

### Response FEA-1

West Basin thanks the commenter for acknowledging West Basin's efforts during the Draft EIR public meeting.

CEQA Guidelines Section 15105 provides that the public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. West Basin not only met, but also exceeded the recommended review period by extending the initial 60-day review period to 91-days, in response to public requests to do so. It is not possible to gauge the time it takes to read a complete Draft EIR, because different people have different levels of comprehension and reading speeds. West Basin acknowledges the level of commitment involved in public participation and engagement in the CEQA process.

Regarding frequently asked questions, West Basin prepared a *Citizen's Guide: A Handbook to the Draft Environmental Impact Report and Review Process* (available at: <http://westbasindesal.com/assets/Documents%20and%20Files/Project%20Materials/Citizens-Guide.pdf>) to answer a variety of questions posed by members of the public. The Citizen's Guide has been available on the West Basin website since March 2018. In addition, this Final EIR includes a series of Master Responses that capture many of the concerns frequently expressed by commenters on the Draft EIR.

### Response FEA-2

The commenter's experience and suggested reading of the June 2006 Pacific Institute materials are noted for the record. Responses to comments FEA-3 through FEA-28 are included in the Final EIR, per CEQA Guidelines.

### Response FEA-3

The cost of a project is not considered an environmental impact under CEQA unless it results in physical changes to the environment. Since the cost of the proposed Project will not in itself result in physical changes, the proposed Project's effect on customer rates is not required to be considered in the Draft EIR. However, West Basin recognizes the importance of having a thorough understanding of the costs and benefits of Project implementation. As part of the Project planning efforts, West Basin prepared preliminary cost estimates for the proposed Project that are included in the Ocean Water Desalination Program Master Plan prepared in 2013. This cost estimate is available on the District's website:

[http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan\\_PMP%20Vol%20I%20\(2013\).pdf](http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan_PMP%20Vol%20I%20(2013).pdf)

These preliminary cost estimates provide a planning-level range of total Project costs that include costs for constructing the treatment facility (including the offshore intake and discharge modifications) and the product water distribution system as well as annual operations and

maintenance costs. These preliminary estimates provide a sense for the ultimate scale of the costs, but present a wide range to account for uncertainty. As the Project design is refined, including permitting and mitigation commitments, actual Project costs will also become more refined. West Basin has initiated a more refined cost estimate and rate study for the proposed Project that is expected to be completed in 2020. See *Master Response: Cost and Rates*.

### **Response FEA-4**

See response to comment FEA-3 and *Master Response: Cost and Rates*.

### **Response FEA-5**

The Draft EIR Section 5.5.4 presents the proposed Project’s energy requirements for construction and operation, summarized in Table 5.5-4. Details regarding operational energy are provided in Tables 5.5-5 and 5.5-6. Regarding cost, please see *Master Response: Non-CEQA Issues* and *Master Response: Cost and Rates*.

### **Response FEA-6**

Draft EIR Subsection 7.2.1 explains that West Basin’s retail water agencies are required to comply with SB X7-7 (Water Conservation Act of 2009) water use reductions targets, while West Basin is not. However, West Basin uses its 2015 Urban Water Management Plan (UWMP) as a “Regional Alliance” UWMP to establish regional demand reduction targets for five of its eight retail agencies<sup>1</sup>. West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio.

### **Response FEA-7**

Regarding the commenter’s concern about water rates’ potential health impacts to low-income communities, please see *Master Response: Environmental Justice* (see also Final EIR Section 18) as well as *Master Response: Cost and Rates*.

### **Response FEA-8**

West Basin held two public meetings, on April 25, 2018, and May 12, 2018, to provide Project information and receive public comments on the Draft EIR. A cumulative total of 151 attendees signed in to the public meetings. A cumulative total of 18 public comments forms, 81 question cards (the questions on the cards were responded to at the meetings) and 8 speaker cards were submitted. The comments were diverse, and covered a range of topics, including cost, and environmental impacts, particularly on the El Porto community. See also response to comment FEA-3 and *Master Response: Cost and Rates*.

### **Response FEA-9**

The comment’s statement that roadways within the proposed Project vicinity are a “major conduit” between “South Bay” and “Silicon Beach” is noted for the record. No further response is

<sup>1</sup> West Basin’s Regional Alliance partners include the California Water Service (Hawthorne Region), City of El Segundo, City of Lomita, City of Manhattan Beach, and the Los Angeles County Waterworks District #29.

warranted. Temporary construction impacts to traffic flow would be managed through the implementation of a Traffic Control Plan that will ensure delays in traffic are minimized.

### **Response FEA-10**

Many different comments were made at the Draft EIR public meetings that pertain to environmental impacts analyzed in the Draft EIR. A majority of comments were raised about impacts to local communities related to traffic and noise.

### **Response FEA-11**

As stated in the Draft EIR on page 5.15-20, Project-related truck trips would use adopted truck routes, including those identified in the El Segundo General Plan Circulation Element Exhibit C-12. Truck routes have been established by local jurisdictions to limit road damage to specific identified routes. Truck haul routes for the proposed Project would be located along Vista Del Mar Boulevard, Imperial Highway, and the I-105. It should be noted that haul routes are subject to change based on final design and engineering requirements.

### **Response FEA-12**

The Traffic Control Plan required to be implemented under Mitigation Measure TRA-1 will account for all routes required for truck trips and road closures associated with the proposed Project, including left turns out of the proposed Project site. Specifically, Mitigation Measure TRA-1 will “identify safety procedures for exiting and entering the site access gate.”

### **Response FEA-13**

The Traffic Control Plan included as Mitigation Measure TRA-1 will minimize delays associated with lane closures that result from proposed Project implementation. As noted on page 5.15-21, although unlikely, temporary full road closures may be necessary for short periods.

### **Response FEA-14**

The traffic impacts resulting from the proposed Project would only occur during construction, and are therefore considered temporary. Lane closures would only occur within segments of roadways within which pipelines are installed. As soon as the pipeline is installed, the segment of the roadway will be opened. This means that while temporary, road closures would not occur along the entire segment of Vista Del Mar. All detours will also be temporary and will be clearly marked. As part of the construction process, West Basin or its construction contractor will hire a public outreach consultant to notify adjacent communities to the planned construction activities within roadways.

See also *Master Response: Environmental Impacts to the El Porto Community*.

### **Response FEA-15**

The 2013 Pacific Institute report cited by the commenter was not consulted in preparation of the Draft EIR because there are more relevant, contemporary and site-specific studies; see EIR Subsection 5.9.7 for a list of sources cited in the Draft EIR. But many of the concepts in the



Pacific Institute report were considered in the preparation of the Draft EIR. For example, page 14 in the Pacific Institute report explains that the addition of diffusers can promote mixing and improve dilution of the brine and notes there is general consensus among modeling studies that optimal mixing is achieved by discharging the brine in sub-tidal, off-shore environments with persistent turbulent flow, and cites Roberts et al. 2010. Dr. Roberts prepared the Draft EIR Appendix 4C (Modeling Brine Disposal from the West Basin Ocean Water Desalination Project, 2018) and Final EIR Appendix 14 (Modeling Linear Diffusers for Brine Disposal from the West Basin Ocean Water Desalination Plant, 2019). Final EIR Section 11, *Refinements to the Project Description*, presents a description of the linear brine diffuser system.

## Response FEA-16

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. The National Oceanic and Atmospheric Administration (NOAA), as the Federally mandated agency responsible for enforcement of the Marine Mammal Protection Act (MMPA) and the Federal Endangered Species Act (FESA) for marine species, has established underwater noise threshold levels for both fish and marine mammals below which no harm is expected. Including a lengthy discussion in the Draft EIR of precisely how underwater noise affects different species of marine mammals or fish is not necessary, since the National Marine Fisheries Service (NMFS) has already conducted these studies and established acceptable underwater noise levels at which little to no harm to fish or marine mammals is expected to occur.

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 recalculates 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 to not harm fish and marine mammals. This plan should include all feasible Best Management Practices (BMPs) currently known to result in reduced 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 the best technology is employed to reduce the generation and potential effects of underwater noise from a Project that is years, if not decades, from its implementation.

Concerning the effects of increased salinity from discharged brines on marine mammals, including dolphins, these are discussed on Draft EIR page 5.11-56. The brine discharge must be within 2 parts per thousand (ppt) of ambient water concentrations within the Brine Mixing Zone (BMZ) which is the region within 328 feet of the diffuser. The time that any dolphin or whale would be passing through this mixing zone would be measured in seconds and not considered to pose any risk. Most marine mammals, including dolphins, inhabit waters of varying salinities, and because of adaptations in kidney structure are capable of tolerating wide ranges of salinities (Ortiz 2001).

## Response FEA-17

As discussed in the Draft EIR Section 3.2, *Project Location*, two of the conventional steam turbine units (Units 3 and 4) on the NRG property were decommissioned in December 2015, but are still existing on-site. The brine discharge from the proposed Project would use a currently unused discharge tunnel and it would not be diluted with El Segundo Power Plant power plant cooling water. Section 5.9, *Hydrology and Water Quality*, explains the proposed Project does not require dilution water in order to meet Ocean Plan thresholds.

## Response FEA-18

Flooding and coastal hazards, 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. Since rising sea levels will increase the potential coastal flooding and flood hazards in the future, West Basin conducted a site-specific Coastal Hazards Analysis for the proposed desalination facility at the ESGS North and South Sites, provided as Draft EIR Appendix 5. As part of this Final EIR, West Basin prepared a supplemental Coastal Hazards Analysis, which is included as Final EIR Appendix 15; see *Master Response: Supplemental Studies*.

## Response FEA-19

The NRG facility constructed a concrete wall between the Marvin Braude Bike Trail and the NRG property in 2012. However, it is a visual screen and security fence; it is not an engineered flood wall. While the wall is referred to as a “tsunami wall” by NRG staff, there is no indication it is designed to meet specific coastal loading criteria. However, it is possible that it is intended to “breakaway” when impacted by extreme coastal events, such as a tsunami or other wave action. The primary purpose of the wall was to mitigate temporary construction impacts to visual resources by users of the adjacent recreational beach. See Final EIR Appendix 15, Subsection 2.1.2.

## Response FEA-20

The Draft EIR used the California Coastal Commission’s 2015 Sea-Level Rise Policy Guidance, but the supplemental Coastal Hazards Analysis (see response to comment FEA-18) utilizes the Ocean Protection Council’s April 2017 *Rising Seas in California: An Update of Sea-Level Rise Science* (Griggs et al. 2017)<sup>2</sup> and the 2018 *CCC Sea Level Rise Guidance* (CCC 2018), as recommended by the CA Coastal Commission in their comments on the Draft EIR (see response to comment CCC-7).

## Response FEA-21

The June 2006 Pacific Institute Study compares energy and GHG emissions of seawater desalination to other water supply options; see *Master Response: Greenhouse Gas Emissions and Energy Use*.

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<sup>2</sup> The Ocean Protection Council’s April 2017 publication was prepared by its Science Advisory Team Working Group (Gary Griggs et al.). The April 2017 publication was used to prepare its *State of California Sea-Level Rise Guidance: 2018 Update*, referenced as Ocean Protection Council 2018.

## Response FEA-22

The comment makes an erroneous presumption that 50 percent of California’s electricity is derived from coal, whereas the actual statewide percentage according to the California Energy Commission was closer to 4 percent in 2017 and is expected to be essentially zero by 2026 (CEC 2018). Furthermore, the state’s Renewable Portfolio Standard (RPS) requires electricity providers to increase the renewable portion of their total sales to at least 33 percent by 2020, 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030.<sup>3</sup>

As shown in the Draft EIR in Tables 5.7-3 and 5.7-4, the vast majority of emissions associated with the Project are attributable to electricity consumption. 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 water supply source than imported water, but increases water supply stability and reliability for the overall regional water supply portfolio. For a discussion of less energy-intensive water supply alternatives, see *Master Response: Greenhouse Gas Emissions and Energy Use*.

## Response FEA-23

The indirect emissions associated with the proposed Project’s building materials, commonly referred to as life-cycle emissions, are not included in the inventory because these emissions would be accounted for under the California Global Warming Solutions Act of 2006 (AB 32) in other industry sectors. Emissions generated during the manufacture of materials and products involve numerous parties, each of which is responsible for the GHG emissions of their particular activity. Recognizing the uncertainties associated with a life-cycle analysis, the California Air Pollution Control Officers Association (CAPCOA) released a white paper in 2008 that states: “The full life-cycle of GHG emissions from construction activities is not accounted for in the modeling tools available, and the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level” (CAPCOA 2008). In addition, the California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses were not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (California Resources Agency 2009).

Additionally, the Draft EIR Section 6 includes an analysis of use of nonrenewable resources, per CEQA Guidelines Section 15126(c) and 15126.2(c).

<sup>3</sup> Following publication of the Draft EIR, on September 10, 2018, Governor Brown signed SB 100, which increased California’s RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. SB 100 also directs CARB to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

## Response FEA-24

The CEQA Guidelines include very specific requirements for notification of public review of a Draft EIR. Section 15087(a) requires one of three notification methods: publication in a newspaper of general circulation; posting of notice on-site where the Project would be implemented; or direct mailing to the owners and occupants of property contiguous to the parcel on which the project would be located. West Basin exceeded the CEQA Guidelines by conducting all three methods of notification. Notification to ratepayers, contrary to the commenter's suggestion, is not required by CEQA. Also refer to *Master Response: Cost and Rates*.

## Response FEA-25

West Basin complied with the requirements for Draft EIR public meetings as presented in CEQA Guidelines Section 15087(i). If and when the Project is approved by West Basin's Board of Directors, West Basin will communicate, as appropriate, with ratepayers.

## Response FEA-26

A total of 97 attendees signed in for the April 25, 2018 Draft EIR public meeting. A total of 54 attendees signed in for the May 12, 2018 Draft EIR public meeting. Attendees included residents, representatives or staff from elected official offices, federal agencies, and community organizations. West Basin is not required to tally the amount of non-repeat attendees at the meetings.

At the public meeting on April 25, 2018, 17 public comment forms and 40 question cards were submitted. At the May 12, 2018 meeting, 1 public comment form, 41 question cards, and 8 speaker cards were submitted. A total of 213 comment letters were received on the Draft EIR.

See response to comment FEA-1 regarding the extended public review period. The Board member qualifications are posted on the West Basin website: <http://www.westbasin.org/board-directors>. The Board meets monthly, and the agendas and minutes are available online.

## Response FEA-27

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). But the need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in UWMP Table 5-5 and 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 2010 and 2015 UWMP Table ES-3).

## **Response FEA-28**

The comment quotes text from a Pacific Institute report cited earlier in the letter. The commenter is referred to *Master Response: Water Supply Alternatives* and *Master Response: Cost and Rates*.

## Response to Letter FER: Michael Ferniany

### **Response FER-1**

The Draft EIR's traffic and transportation impacts are temporary and would only occur during construction. Once construction is complete along Vista Del Mar, the roadways would be returned to their pre-construction condition. See also *Master Response: Environmental Impacts to the El Porto Community*. The Draft EIR addresses cumulative traffic impacts, including those from nearby industrial development, on pages 5.15-40 to 5.15-41.

### **Response FER-2**

Draft EIR Subsection 7.2.2 evaluates site alternatives. Neither San Pedro nor Long Beach are within the West Basin service area.

## Response to Letter FON: Barbra Fontana

### **Response FON-1**

The commenter is referred to *Master Response: Water Supply Alternatives* and *Master Response: Cost and Rates*. The commenter is also referred to Section 5.11, *Marine Biological Resources*, for a discussion of environmental impacts related to marine biological resources, which were found to be less than significant with implementation of mitigation measures.

## Response to Letter FOR: Christopher Forrest

### Response FOR-1

The commenter is referred to *Master Response: Non-CEQA Issues* and *Master Response: Environmental Impacts to the El Porto Community*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

### Response FOR-2

The decision to build the Project has not yet been made; the West Basin Board of Directors will make that decision upon review of the Final EIR.

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.



## Response to Letter FRAN: Dean Francois

### Response FRAN-1

The Draft EIR Subsection 7.2.1 evaluates a range of water supply alternatives, including recycling, and explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production at the Hyperion Water Reclamation Plant to its full capacity 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.

### Response FRAN-2

The comment expresses concern about wildlife. Although West Basin appreciates the concerns raised, the comment 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.

### Response FRAN-3

An alternative at AES Redondo Beach Generating Station was evaluated in Draft EIR Subsection 7.3.2.

### Response FRAN-4

Draft EIR Subsection 7.2.1 explains that West Basin's retail water agencies are required to comply with SB X7-7 (Water Conservation Act of 2009) water use reductions targets, while West Basin is not. However, West Basin uses its 2015 Urban Water Management Plan (UWMP) as a "Regional Alliance" UWMP to establish regional demand reduction targets for five of its eight retail agencies<sup>4</sup>. West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio.

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<sup>4</sup> West Basin's Regional Alliance partners include the California Water Service (Hawthorne Region), City of El Segundo, City of Lomita, City of Manhattan Beach, and the Los Angeles County Waterworks District #29.

## Response to Letter FRAN2: Dean Francois

### Response FRAN2-1

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 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.

Numerous visual simulations from the public vantage points along the beach and in northern Manhattan Beach are included in the Draft EIR to disclose visual impacts of the Local Project (see Figures 5.1-6 through 5.1-10, 5.1-16, and 5.1-19 through 5.1-20), and are accompanied by textual descriptions of the proposed changes. Most notable is Figure 5.1-7 and the accompanying text on page 5.1-37, which states that: "The proposed new ocean water desalination facility at the ESGS South Site would not result in any significant view blockage of beach areas or ocean views; refer to Figure 5.1-7. Views to some landscaped slopes would be replaced with Local Project ocean water desalination facility structures. The proposed structures would appear to encroach closer to beach areas when compared to the existing condition." The text explains that while new structures would be visible from the beach, view blockage of the beach or ocean views would not occur as a result of the proposed Project. See *Master Response: Environmental Impacts to the El Porto Community*.

### Response FRAN2-2

West Basin has maximized the space available for use at the NRG site in El Segundo. Please see Section 11 of the Final EIR, *Refinements to the Project Description*. See also *Master Response: Supplemental Studies*, specifically the discussion of Coastal Hazards.

## Response to Letter FRAS: Robert Fraser

### Response FRAS-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same, Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter FREE: Robert Freeman

### **Response FREE-1**

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*.

## Response to Letter FREG: Scott Frego

### Response FREG-1

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*. 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 also *Master Response: Non-CEQA Issues*.

### Response FREG-2

To address encountering contaminated soil, Mitigation Measures HAZ-1 and HAZ-2 require preparation and implementation of procedures and protocols for training demolition and construction workers in recognizing hazardous materials, describing all waste streams, managing excavated soil, and testing of soils to identify the appropriate handling and disposal of soils. In addition, as explained in the Draft EIR Section 5.2, *Air Quality*, in Impact AQ 5.2-1, page 5.2-23, the Project would be required to comply with the South Coast Air Quality Management District's (SCAQMDs) requirements for controlling fugitive dust pursuant to SCAQMD Rule 403. Details of the procedures to comply with Rule 403 are listed in Mitigation Measure AQ-1 on page 5.2-40, and include watering of active work surfaces, covering of stockpiles, work prohibitions if wind speeds exceed 25 miles per hour, and the covering of trucks transporting soil off-site. Compliance with existing regulations and implementation of the mitigation measures would ensure contaminated materials are properly handled and contained to prevent fugitive dust and spillage from trucks transporting contaminated materials. The following change has been made to Mitigation Measure AQ-1 to correct a typographical error.

**AQ-1:** Prior to construction, West Basin shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 403~~2~~ requires implementation of the following dust suppression techniques to prevent fugitive dust from creating a nuisance off-site and reduce construction-related fugitive dust impacts on nearby sensitive receptors:...

### Response FREG-3

As noted on page 5.1-12, Mitigation Measure AES-2 requires that rooftop equipment be screened from public view. The analysis concludes that the new structures would be visible from surrounding areas, but would not deteriorate the local character or substantially affect views of the ocean. As discussed on page 5.12-19, all stationary mechanical equipment (e.g., pumps, generators, including HVAC) would be housed within enclosed structures; therefore, noise generated by ocean water desalination facility operation would be minimal and would not adversely affect nearby sensitive receptors (i.e., residential uses located approximately 130 feet south of the ESGS South Site facilities), and thus would not generate operational noise levels that would expose persons to or generate noise levels in excess of applicable standards. In addition, Mitigation Measure NOI-4 would require that West Basin enclose all noise-generating machinery to meet nighttime noise standards for residential uses, which would achieve 40 dBA attenuation.

As a result, noise levels at the property line would be reduced to below operational noise standards for residential use.

### **Response FREG-4**

For stormwater capture to be considered as a new local water supply for West Basin Municipal Water District, stormwater runoff would not only have to be captured and stored within the West Coast Groundwater Basin when available, but it would also have to be produced as groundwater by West Basin's customer retail water agencies with groundwater rights. But the need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in West Basin's 2015 Urban Water management Plan (UWMP) Table 5-5 and 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). See Draft EIR Subsection 7.2.1, and *Master Response: Water Supply Alternatives*.

### **Response FREG-5**

Hyperion Water Reclamation Plan is operated by the City of Los Angeles and is its largest wastewater treatment facility. The plant has been improved numerous times over its 100-year history (City of Los Angeles 2019). The location of the proposed Project analyzed in the Draft EIR, as well as the Project site alternatives analyzed in Section 7, is based on proximity to West Basin's customers and water distribution network. Since West Basin does not own the Hyperion facility, it would be infeasible to assume such an extensive wastewater facility could accommodate the proposed Project.

### **Response FREG-6**

An alternative at the AES Redondo Beach Generating Station (RBGS) was evaluated in Draft EIR Subsection 7.3.2. This alternative would satisfy the Project objectives but would generally have greater marine impacts as compared to the ESGS site due to greater larval abundance and associated increased mitigation requirements. However, impacts would remain less than significant. The AES RBGS site would generally have reduced onshore environmental impacts as compared to the ESGS South Site and similar impacts when compared to the ESGS North Site. As noted by the City of Redondo Beach in comment RBCH-4 on the Draft EIR: "the consideration of an alternative facility at the AES Generating Station in Redondo Beach [would] be contrary to all current efforts underway to de-industrialize 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." If the site were to become available, the 5.9-acre

area of disputed coastal wetlands were to be satisfactorily resolved, and site development were to be supported by the City of Redondo Beach, the AES RBGS site would remain under consideration by West Basin as an alternative to the ESGS South Site.

## Response to Letter GAL: Robert Gallman

### Response GAL-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

The community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.



## Response to Letter GILM: Carrie Gilmer

### Response GILM-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Water Supply Alternatives*.

## Response to Letter GIL: Steve Gilmour

### **Response GIL-1**

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter GIL2: Steve Gilmour

### Response GIL2-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Water Supply Alternatives*.

## Response to Letter GRA: Margaret Grant

### Response GRA-1

The use of renewable energy is addressed in several places in the Draft EIR. Section 5.5.4 (page 5.5-17) acknowledges that “(t)he electricity demands of the desalination facility and pump stations would be supplied by SCE, which is subject to the California Renewables Portfolio Standard Program. Over time, the electricity available to the proposed Project will include greater contributions from renewable energy supplies.”

Mitigation Measure GHG-1 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.

### Response GRA-2

The potential effects of the brine discharge on marine habitats and marine biota is discussed in detail in the Draft EIR Section 5.11, *Marine Biological Resources*, on pages 5.11-56 through 5.11-58. Potential effects of brine discharge on water quality are discussed in the Draft EIR Section 5.9, *Hydrology and Water Quality*, on pages 5.9-49 through 5.9-61.

### Response GRA-3

Regulations relevant to the proposed Project relating to ocean and coastal environments are presented in detail in the Draft EIR Subsections 5.9.1 (Hydrology and Water Quality), 5.11.1 (Marine Biological Resources), 5.16.1 (Utilities and Service Systems, including safe drinking water laws and regulations), and 5.8.1 (Hazards and Hazardous Materials). As discussed in the Draft EIR sections presenting impact analyses relating to these topics (Subsections 5.9.4, 5.11.4, 5.16.4, and 5.8.4 *et seq.*), the assessment of impacts comprehensively applied and considered the applicable regulations discussed in the regulatory setting sections, such as the Water Quality Objectives of the California Ocean Plan, the California Coastal Commission’s Sea-Level Rise Policy Guidance, the Coastal Act policies relating to shoreline protection, and the Safe Drinking Water Act.

## Response to Letter GUR: David Gurewitz

### Response GUR-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter GUT: Felipe Gutierrez

### **Response GUT-1**

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*.

## Response to Letter HARD: Mary Hardin

### Response HARD-1

The commenter is referred to: *Master Response: Cost and Rates*, *Master Response: Greenhouse Gas Emissions and Energy*, and *Master Response: Non-CEQA Issues*. The commenter is also referred to Section 5.11, *Marine Biological Resources*, for a discussion of environmental impacts related to marine biological resources, which were found to be less than significant with implementation of mitigation measures.

The Draft EIR Subsection 7.2.1 considered a range of alternatives, including increased conservation, stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse (see Draft EIR Table 7-1). The section explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production at the Hyperion Water Reclamation Plant to its full capacity 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. See also *Master Response: Water Supply Alternatives*.

### Response HARD-2

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter HAR: Susan Harris

### **Response HAR-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 also *Master Response: Non-CEQA Issues* and *Master Response: Water Supply Alternatives*.

### **Response HAR-2**

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 also *Master Response: Non-CEQA Issues*, *Master Response: Cost and Rates*, and *Master Response: Water Supply Alternatives*.



## Response to Letter HIR: Emanuel Hirsch

### **Response HIR-1**

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter HOP: Marsha Hopwood

### **Response HOP-1**

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*.

## Response to Letter JASJ: Jay Jasaitis

### Response JASJ-1

The ocean water desalination facility is proposed to be located at NRG's facility in El Segundo, which is zoned for Heavy Industrial uses (see the Draft EIR page 5.10-34) and is occupied by a heavy industrial user. As the comment states, this site is an industrial complex. The siting of a light industrial facility (such as a desalination facility) within the industrial complex would be compatible with the surrounding heavy industrial uses. Hazards are discussed in Draft EIR Section 5.8 and Aesthetics are discussed in Section 5.1. Construction of the Local Project is anticipated to occur over approximately 72 months (see Draft EIR Section 3.5) and would last 36 months for the Regional Project (see Draft EIR Section 3.6).

See also *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Water Supply Alternatives*, and *Master Response: Non-CEQA Issues*.

## Response to Letter JASJ2: Jay Jasaitis

### **Response JASJ2-1**

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*. The environmental impacts of the proposed Project are addressed throughout Section 5, *Environmental Analysis*.

### **Response JASJ2-2**

See response to comment JASJ-1.

## Response to Letter JASM: M. Dalia Jasaitis

### Response JASM-1

The ocean water desalination facility is proposed to be located at NRG's facility in El Segundo, which is zoned for Heavy Industrial uses (see the Draft EIR page 5.10-34). The location of a desalination plant (a light facility facility) amongst the existing heavy industrial facilities would be compatible with the surrounding uses. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Water Supply Alternatives*, and *Master Response: Non-CEQA Issues*.

## Response to Letter JOH: Dave Johnson

### Response JOH-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter KAR: Karen

### Response KAR-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, and as noted by the comment, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter KEL: Harry Keller

### Response KEL-1

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*.

Regarding renewable power for the proposed Project, the Draft EIR states on page 5.5-15 that West Basin has and will continue to participate in energy and water conservation programs and the use of on-site renewables. West Basin is committed to pursuing reasonable energy minimization and efficiency as part of the Project. The Project would incorporate all feasible available energy recovery and conservation technologies as described in Mitigation Measure GHG-1.



## Response to Letter KEN: Rebecca Kendall

### **Response KEN-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*. The commenter is also referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter KER: Lindsey Kernan

### Response KER-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved. The commenter is referred to *Master Response: Non-CEQA Issues* and *Master Response: Environmental Impacts to the El Porto Community*.

### Response KER-2

The assessment of impacts on water quality from the discharge of brine, from the proposed Project, incorporates the numeric thresholds defined in the Ocean Plan for determining impacts from operation of the Local and Regional Project. Specifically relating to salinity, as described in detail under Impact 5.9-2 (Draft EIR Subsection 5.9.4), the California Ocean Plan limits the increase of salinity of receiving water from desalination plant discharges to a daily maximum of 2 parts per thousand (ppt) above natural background salinity at the boundary of the Brine Mixing Zone (BMZ), defined as the horizontal distance of 100 meters (328 feet) from the point of discharge. As presented in Table 5.9-6 and 5.9-8 (see response to comment LARWQCB-30 for further discussion relating to supplemental studies and revisions to the Draft EIR), the Local and Regional Projects would meet the Ocean Plan salinity standard at a maximum of 63 feet and 98 feet from the point of discharge, respectively, for all scenarios modeled.

Similarly, for other water quality constituents, the analysis of water quality impacts incorporates the numeric water quality objectives defined in the Ocean Plan, as summarized in the Draft EIR Table 5.9-2. As discussed in detail under Impact 5.9-2, brine discharges would not cause or contribute to an exceedance of relevant water quality standards and would not pose any risk to marine habitats and taxa, including special-status fish, marine mammals, and sea turtles (Draft EIR Subsection 5.11.4, page 5.11-56).

## Response to Letter KLA: Aaron Klafter

### Response KLA-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter KLI: Karen Klink

### Response KLI-1

The commenter is referred to *Master Response: Cost and Rates*, *Master Response: Greenhouse Gas Emissions and Energy*, and *Master Response: Non-CEQA Issues*. The commenter is also referred to Section 3, *Project Description* of the Draft EIR, for a discussion of chemicals used in and produced by the proposed Project, which are analyzed in Section 5.8, *Hazards and Hazardous Materials*. Section 5.11, *Marine Biological Resources*, for a discussion of environmental impacts related to marine biological resources, which were found to be less than significant with implementation of mitigation measures.

## Response to Letter KRE: Michael Kreger

### **Response KRE-1**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Cost and Rates*.

## Response to Letter LEL: Andrew Leichuk

### Response LEL-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter LIB: Thomas Libbey

### **Response LIB-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 to Letter LOM: David Lombard

### **Response LOM-1**

The commenter is referred to Section 7, *Alternatives to the Proposed Project*, *Master Response: Water Supply Alternatives*, and *Master Response: Non-CEQA Issues*.



## Response to Letter LON: Janet London

### Response LON-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval. See also *Master Response: Non-CEQA Issues*.

## Response to Letter MAGG: Kevin Maggay

### Response MAGG-1

The Draft EIR includes a robust non-deferral analysis of greenhouse gas emissions and mitigation, in Section 5.7, *Greenhouse Gas Emissions*, and marine biology, in Section 5.11, *Marine Biological Resources*.

### Response MAGG-2

The Draft EIR on page 5.7-25 notes that as California's electricity providers increase the percentage of renewable energy in their portfolios, per SB 350 and California's RPS program, GHG emissions associated with Project operations will be reduced. Both the Local Project's total emissions and the emissions associated with imported Metropolitan Water District of Southern California (MWD) water are anticipated to go down over time due to California's Renewable Portfolio Standards (RPS), with the likely result that the proposed Project emissions subject to mitigation would be less than the current estimate of 10,959 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) presented in the Draft EIR (Table 5.7-3). An example is provided to demonstrate that, assuming the 50 percent renewables standard is met by 2030, as mandated by SB 350,<sup>5</sup> Local Project emissions would be reduced to approximately 17,800 MTCO<sub>2e</sub> in 2030, while the emissions associated with the same volume of imported water would be reduced to approximately 10,800 MTCO<sub>2e</sub>, netting a difference of approximately 7,000 MTCO<sub>2e</sub> above the threshold that would be subject to mitigation by Mitigation Measure GHG-1. For the Local Project plus Regional Project (60 MGD), the net increase in emissions would be approximately 25,000 MT CO<sub>2e</sub> rather than the 36,765 MTCO<sub>2e</sub> presented in the Draft EIR (Table 5.7-4).

With regards to the comment's statements about the efficacy of the mitigation measures, see response to MBCH3-58.

### Response MAGG-3

As explained in the Draft EIR Section 5.11, *Marine Biological Resources*, on pages 5.11-49 through 5.11-61, there have been decades of studies on entrainment impacts from coastal power plants' once through cooling systems in the Santa Monica Bay (SMB) and throughout the State. The potential ecosystem effects of the entrainment caused by these operations is fairly well understood. However, there have only been a few coastal desalinization plants placed into operations along the California coast, and none of these currently utilize the reduced ocean intake flow rates or a wedgewire screen to reduce potential entrainment that are specified in the Ocean Plan. As indicated in the Draft EIR Section 5.11, West Basin did commission a study of the effectiveness of wedgewire screens and intake flow rates of <0.5 fps on impingement and entrainment (Tenera 2014). Also, as explained 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

<sup>5</sup> With the passing of SB 100, the RPS standard has increased to 60 percent by 2030. SB 100 also directs CARB to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

Basin to mitigating potential entrainment impacts of the proposed Project with ecosystem enhancement efforts.

### **Response MAGG-4**

The comment expresses opinion on using worst-case scenarios within an EIR. As evidenced in the opinion rendered on *High Sierra Rural Alliance v County of Plumas* (2018) 29 Cal.App.5th 102, an EIR is not required to speculate on a worst-case scenario. The commenter is referred to *Master Response: Non-CEQA Issues*. See response to comment MAGG-3.

Every topical section in Section 5, *Environmental Analysis*, including 5.7 *Greenhouse Gas Emissions* and 5.11 *Marine Biological Resources*, has been analyzed and supported by substantial research. These studies have been either included as appendices or referenced throughout the Draft EIR. Section 2.10, on page 2-28, illustrates a brief overview of the referenced research milestones West Basin has completed as part of the Project development background. The referenced researched are posted on the West Basin website: <http://westbasindesal.com/research-and-planning.html>

## Response to Letter MAGI: Kiran Magiawala

### **Response MAGI-1**

Verified carbon offsets from an approved registry are included as an implementation option in the Energy Minimization and GHG Reduction Plan described in Mitigation Measure GHG-1. All of the approved registries referenced in the Draft EIR include protocols for developing and verifying carbon offsets from reforestation projects.

## Response to Letter MAL: Peggy Malpee

### Response MAL-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

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 warranted; see *Master Response: Non-CEQA Issues*.

### Response MAL-2

At the proposed ESGS site, the proposed Project, as a light industrial facility, would be located among the array of existing heavy industrial facilities along the Santa Monica coastline. The parking lots along Dockweiler Beach referenced by the comment are not zoned for such industrial use, and would likely be more inconsistent with surrounding land uses, aesthetic conditions, and recreational uses than the proposed Project.

## Response to Letter MARA: Andrea Marron

### **Response MARA-1**

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter MARA2: Andrea Marron

### Response MARA2-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

The commenter is also referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter MARJ: Joseph Marron

### **Response MARJ-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 warranted; see *Master Response: Non-CEQA Issues*. The commenter is also referred to *Master Response: Environmental Impacts to the El Porto Community*.



## Response to Letter MAS: Allan Mason

### **Response MAS-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*. The commenter is referred to *Master Response: Cost and Rates*.

## Response to Letter MATL: Shawn Matlosz

### **Response MATL-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 warranted; see *Master Response: Non-CEQA Issues*. It is unclear which “viable options” are referenced by the comment in relation to Heal the Bay. Regarding alternatives to the proposed Project, the commenter is referred to *Master Response: Water Supply Alternatives*.

## Response to Letter MATT: Ella Matthes

### Response MATT-1

The commenter is referred to Section 5.11, *Marine Biological Resources*, for a discussion of environmental impacts related to sea life, which were found to be less than significant with implementation of mitigation measures. The commenter is referred to *Master Response: Cost and Rates*.

The Draft EIR evaluates two possible locations for the ocean water desalination facility which are both zoned as Heavy Industrial (see the Draft EIR page 5.10-34). The commenter is also referred to *Master Response: Water Supply Alternatives*.

## Response to Letter MCM: Craig McManis

### **Response MCM-1**

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter MCM2: Craig McManis

### Response MCM2-1

See response to comment MCM-1. The comment suggests a variety of ways that West Basin should compensate affected property owners for “loss of tranquility” resulting from proposed Project implementation. West Basin as a lead agency has proposed this Project to increase water supply reliability within its service area. West Basin has discretion to propose, consider and implement projects that are in line with its water supply planning portfolio goals. CEQA Guidelines Section 15126.4 explains that EIR mitigation measures (compensation) must have an essential “nexus,” or connection, between the impact and the government interest (*Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)), and that the mitigation must be roughly proportional to the impacts of the project (*Dolan v. City of Tigard*, 512 U.S. 374 (1994)). Ultimately, the West Basin Board of Directors will consider all comments made on the Draft EIR when considering whether or not to certify the EIR and approve the Project.

See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.

## Response to Letter MCP: Rachel McPherson

### Response MCP-1

West Basin is public water agency, leader in recycled water production, conservation and education programs. The Draft EIR evaluates the potential environmental impact for West Basin's proposed Ocean Water Desalination Project that aims to produce a sustainable, drought-proof, local potable water supply within our service area. 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 warranted; see *Master Response: Non-CEQA Issues* and *Master Response: Water Supply Alternatives*. Regarding Project cost, the commenter is referred to *Master Response: Cost and Rates*.

### Response MCP-2

The comment's assertion that 100 percent of the phytoplankton and zooplankton entrained into the ocean water intake will be killed, is correct. That is why the assumption of total loss of any entrained phytoplankton and zooplankton was the key basis on which the potential impact and marine ecosystem effects of the proposed Project were conducted (Draft EIR pages 5.11-49 through 5.11-61). The comment's concern that the periodic cleaning of the wedgewire screens will result in increased bacteria is not supported in any way. Bacteria are present in ocean waters and provide a very valuable function in the ecosystem. Localized currents and wave swell at the location of the ESGS intake ocean terminus can be expected to quickly remove any encrusting materials removed during periodic cleaning of the wedgewire screen, as ocean waves and surge typically do. The comment's suggestion that hypothetical increased bacteria inhabiting the waters immediately around the wedgewire screens will result in reduced intake flows and failure of the screens themselves, is also unsupported by any engineering or ecological data. As presented in the Draft EIR Section 3, *Project Description*, the potential effect of temporary screen fouling on operation of the proposed Project has been considered in the Project design, based on similar applications of wedgewire screens around the world. Finally, the comment's statement that entrainment impacts have not been adequately studied in the area is not true. Entrainment studies of three Once Through Cooling ocean intakes for coastally sited power plants have been conducted since the early 1980's, and those studies were used in assessing the potential impact of the proposed Project's ocean water intake on larval fish and plankton (Draft EIR pages 5.11-49 through 5.11-61).

### Response MCP-3

The impacts of brine discharge have been evaluated in the Draft EIR consistent with the 2015 Ocean Plan Amendment, and consistent with Roberts, 2018 (see response to comment LARWQCB-30). As discussed in Subsection 5.9.4 of the Draft EIR, consistent with the requirements of the California Ocean Plan, the Project-specific dilution analyses completed in support of the impact assessment assume zero ocean current velocity, representing the worst-case condition in terms of brine dilution (and potential salinity concentrations) with receiving waters. As described in Subsection 5.9.2 of the Draft EIR, the environmental parameter most relevant for dilution and mixing is the receiving water density structure. Overall, the effect of ocean currents

is to increase dilution compared to the zero current results presented in the Draft EIR. Resulting salinities at the Brine Mixing Zone (BMZ) boundary would be substantially lower than those reported in the Draft EIR since 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 required 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.

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). Recycled water is a proven technology that is legally feasible and an important component of West Basin’s water supply portfolio. The Indirect Potable Reuse (IPR) Alternative is a long-range goal for West Basin and requires successfully addressing the many complexities and institutional issues of increasing utilization of the Basin, including further expanding non-potable reuse to increase Basin pumping and protect groundwater quality by requesting that current industrial groundwater pumpers switch supply sources at additional expense. Direct introduction of advanced treated recycled water into the treated drinking water distribution system to produce a Direct Potable Reuse (DPR) supply faces the greatest challenges in regulation development, technology development, and public health safeguards. The implementation of the proposed Project would allow West Basin to position itself to consider DPR through raw water augmentation for blending when such regulations are in place. The absence of the proposed Project makes this alternative infeasible and too speculative for obtaining the 21,500 acre-feet per year (AFY) of potable drinking. See *Master Response: Water Supply Alternatives*.

## **Response MCP-4**

The Draft EIR Subsection 7.2.1 considered a range of 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*.

## Response to Letter MER: Arthur Merkin

### **Response MER-1**

The commenter is referred to *Master Response: Water Supply Alternatives*, *Master Response: Non-CEQA Issues*, and *Master Response: Environmental Impacts to the El Porto Community*.



## Response to Letter MIC: Suzanne Michel

### **Response MIC-1**

The commenter is referred to *Master Response: Non-CEQA Issues*, *Master Response: Water Supply Alternatives*, and *Master Response: Environmental Impacts to the El Porto Community*. 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 warranted.

## Response to Letter MILZ: Tracey Miller-Zarneke

### Response MILZ-1

The cost of a project is not considered an environmental impact under CEQA unless it results in physical changes to the environment. Since the cost of the proposed Project will not in itself result in physical changes, the proposed Project's effect on customer rates is not required to be considered in the Draft EIR. However, West Basin recognizes the importance of having a thorough understanding of the costs and benefits of project implementation and initiated a rate impact analysis in 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, and 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. See *Master Response: Cost and Rates*. Potential impacts on the local communities are discussed throughout the topical sections in Draft EIR Section 5, *Environmental Analysis*.

### Response MILZ-2

New conveyance infrastructure would convey the desalinated water from the desalination facility to the existing distribution system that delivers potable water to local area and regional supply feeders owned by Metropolitan Water District of Southern California (MWD), and they are described in Draft EIR Subsection 3.4.1 for the Local Project and in Subsection 3.4.2 for the Regional Project. This treated water would comply with all drinking water standards. If the comment is referring to direct potable reuse (DPR), the proposed Project is not a DPR project. The Local Project conveyance facilities construction activities are described in Draft EIR Subsection 3.5.3 while the Regional Project conveyance facilities construction activities are described in Draft EIR Subsection 3.6.3. The potential impacts on all resources are discussed throughout the topical sections in Draft EIR Section 5 (*Environmental Analysis*).

### Response MILZ-3

The Draft EIR Subsection 7.2.1 considered a range of alternatives, including stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse (see Draft EIR Table 7-1). The section explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production at the Hyperion Water Reclamation Plant to its full capacity 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. The 100 million gallons per day (MGD) that the comment referenced was West Basin's vision in 1990. Edward C. Little Water Recycling Facility (ECLWRF) was commissioned in around 1994 and has gone through multiple expansions based on the growth of its customers in the last 25 years. The current treatment capacity at ECLWRF is 40 MGD. See response to comment HTB-37, LAW2-44 and *Master Response: Water Supply Alternatives*.

### Response MILZ-4

The mitigation measures prescribed in the Draft EIR have performance standards, or measures, that must be met in order for the impacts to be considered less than significant. The performance

standards can generally be achieved with the implementation of different measures. Some of the measures may be infeasible and therefore not undertaken. But that does not obviate the Project's commitment to meeting the performance standard with measures that are feasible, some of which may not be known at the current phase of the Project.

The use of indirect or off-site habitat restoration is a common and authorized mitigation approach for addressing potential ecosystem-wide impacts from projects, and is prescribed in the 2015 California Ocean Plan Chapter III.M.2.e. It is typically employed when implementing some type of direct mitigation is not feasible or practicable, such as replanting protected species that might be affected by an onshore construction project. Ideally, the off-site habitat restoration will provide some improvement of the species or ecosystem being affected by the project for which the mitigation is required. In the case of mitigating potential Project entrainment impacts, habitat restoration at the Ballona wetlands, other coastal wetlands or habitats within SMB, or enhancement efforts at any of the Marine Protected Areas bordering SMB, would all improve the production, development and recruitment of marine invertebrate and vertebrate taxa into SMB, therein addressing the loss of fish and invertebrate larva, therefore marine ecosystem productivity, caused by entrainment of these organisms.

### **Response MILZ-5**

The threshold for using subsurface intakes is feasibility. As explained and summarized in the Draft EIR Subsection 2.10.10, West Basin since 2007, has extensively evaluated the technical, economic, social and environmental feasibility of incorporating subsurface seawater intake (SSI) systems into Project design. In 2015, West Basin initiated a site-specific study of SSIs to evaluate their feasibility for providing feedwater to the proposed desalination facility at the ESGS facility; see Draft EIR Appendix 2. As explained in the Draft EIR Subsection 7.2.3, the site specific study outlined the local geology and proximity to subsurface ocean water and evaluated numerous technologies that could access subsurface ocean water and concluded that due to the local geology, existing coastal development, subsurface water quality, potential for interference with the operation of the West Coast Seawater Barrier Project, and untested expensive technology, subsurface intakes would be infeasible. In response to this and similar comments on the Draft EIR, West Basin has prepared a supplemental Subsurface Intake Feasibility Study (Final EIR Appendix 13); see *Master Response: Supplemental Studies*.

### **Response MILZ-6**

West Basin is committed to partnering with regional agencies to maximize other local water supplies in addition to ocean water desalination. Ocean water desalination is just one component of a balanced local water supply approach, with the Local Project supplying approximately 10 percent of West Basin's total water demand. This type of water supply diversification balances benefits and risks associated with each supply type. Since ocean water desalination requires greater energy to produce, the portfolio approach provides a portion of water supply that would maximize the benefits of drought-proof reliability. Developing a drought-proof portion of the local water supply substantially increases water supply reliability resulting in fiscally and environmentally responsible water supply planning.

## Response to Letter MILE: Emmett Miller

### Response MILE-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter MILM: Manuela Millington

### Response MILM-1

The Draft EIR Subsection 7.2.1 considered a range of 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*.

### Response MILM-2

Electricity is required to operate the facility, as discussed in Draft EIR Section 5.5, *Energy*. Air emissions associated with the generation of electricity are the responsibility of the energy producers. The Draft EIR acknowledges that criteria pollutants, toxic air contaminants, and GHG emissions can be associated with the off-site generation of electricity depending on the type of energy generation technology. These indirect emissions would not be experienced in the vicinity of the proposed Project, but would be associated with maintenance of the electric grid. As described on Draft EIR page 5.5-2, California's Renewables Portfolios Standard (RPS) requires that renewable energy sources make up 33 percent of total energy use by 2020. The Clean Energy and Pollution Reduction Act of 2015, SB 350, increases renewable requirements even further. As a result, emissions associated with electricity generation will be reduced incrementally in the future compared to existing conditions for similar amounts of electricity consumption.

Regarding the commenter's concern related to potential impacts of Electric and Magnetic Fields (EMF) associated with the proposed Project, the National Institute of Environmental Health Sciences states that "[a]t a distance of 300 feet and at times of average electricity demand, the magnetic fields from many lines can be similar to typical background levels found in most homes" (NEIHS 2002). While it is reasonably foreseeable that upgrades to SCE's power grid may be needed, which may result in construction of new or use of existing power lines, SCE is unable to confirm what those necessary upgrades would be. As such, predicting and analyzing the impacts of these upgrades, including impacts related to EMF, would be speculative at this time.

### Response MILM-3

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). The community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Non-CEQA Issues* and *Master Response: Water Supply Alternatives*.

## **Response MILM-4**

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* and *Master Response: Water Supply Alternatives*.

## Response to Letter MITL: Jane Mitchell

### **Response MIT-1**

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. The commenter is referred to *Master Response: Non-CEQA Issues*.

## Response to Letter MOE: Annelisa Moe

### **Response MOE-1**

The oral comments referenced by the commenter are responded to in response to comment MOE-2.

### **Response MOE-2**

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. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period.

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 warranted.



## Response to Letter MOI: Elizabeth Moir

### Response MOI-1

West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. The expansion of an existing conservation program does not meet the objective of water supply diversification, and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought. See EIR Subsection 7.2.1 and *Master Response: Water Supply Alternatives*.

### Response MOI-2

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

### Response MOI-3

West Basin has not finalized its funding portfolio for the proposed Project, but financing methods may include any combination of public-private partnerships (P3), low interest loans, grant funding, and traditional financing through bonds or capital loans. See also *Master Response: Cost and Rates*.

### Response MOI-4

CEQA requires lead agencies to consider environmental effects associated with project approvals, but does not require any financial impact analysis regarding either the cost of the project itself, or potential impacts to property values for any parcels or communities adjacent to the project site. Nevertheless, the community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. See *Master Response: Non-CEQA Issues*.

### Response MOI-5

The commenter is referred to *Master Response: Non-CEQA Issues* and *Master Response: Cost and Rates*.

## Response to Letter MOO: Lynne Moore

### Response MOO-1

West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. The expansion of an existing conservation program does not meet the objective of water supply diversification, and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought. See EIR Subsection 7.2.1 and *Master Response: Water Supply Alternatives*.

The Draft EIR Subsection 7.2.1 evaluates a range of water supply alternatives, including recycling, and explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production at the Hyperion Water Reclamation Plant to its full capacity 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.

### Response MOO-2

The properties of the brine discharge associated with the Local Project and the Regional Project are summarized in the Draft EIR Tables 5.9-5 and 5.9-7, respectively; it will not be a “thick, murky brine.” As discussed in the Draft EIR Section 5.9, *Hydrology and Water Quality*, the brine discharge would be slightly more saline than ambient ocean water and will be < 2ppt above ambient conditions between 45 and 63 feet from the discharge for the Local Project and between 70 and 98 feet for the Regional Project (see Final EIR Appendix 14A) for all scenarios modeled. The potential effects on water quality of the brine discharge are discussed in detail in the Draft EIR on pages 5.9-49 through 5.9-61. Potential effects on marine biota are also thoroughly assessed and discussed in the Draft EIR Section 5.11, *Marine Biological Resources*, on pages 5.11-56 through 5.11-58.

The Draft EIR Subsection 3.4.1 discusses the need for the handling and treatment of solids removed from the backwash water: “Generation of centrifuge cake solids would vary according to seasonal ocean water quality variations, but is expected to be in the range of 0.05 to 0.2 cubic yards (CY) per million gallons of desalinated water produced.” The air quality and transportation impacts associated with removing 1 to 4 CY/day of centrifuge cake are minimal and have been included in Draft EIR Sections 5.2 and 5.15, respectively.

### Response MOO-3

“Health” is a broad term; however, potential health-related effects of the proposed Project are addressed in Draft EIR Section 5.2, *Air Quality*, 5.3, *Biological Resources*, 5.7, *Greenhouse Gas Emissions*, 5.11, *Marine Biological Resources*, and 5.12, *Noise*. A Health Risk Assessment was conducted for the Draft EIR as explained starting on page 5.2-48. With implementation of the identified mitigation measures, health risk related to particulate matter would be reduced to a less than significant level. The Board of Directors will use the conclusions presented in the Draft EIR as it considers whether or not to certify the EIR and/or approve the Project.

## Response MOO-4

West Basin will be required to meet all applicable laws, regulations and requirements of the authorities with jurisdiction, during the permitting phase of the Project. See also *Master Response: CEQA and Ocean Plan Compliance*.

## Response MOO-5

The comment introduces subsequent comments. Responses to those comments are found in response to comment MOO-6 through MOO-19.

## Response MOO-6

West Basin is governed by an elected five-member Board of Directors and each board member represents a designated division of the district. The Board of Directors will decide if it is in the District's best interest to pursue the proposed Project as part of a diversified water supply portfolio. If a board member does not adequately represent the ratepayer, voters can elect a different representative. Board members were not present at the April 2018 Draft EIR Public Meeting although they were briefed at their meeting on May 3, 2018; Board members are available to receive public comment at every scheduled board meeting. Draft EIR Section 3.5 explains construction of the Local Project would take up to 72-months and Section 3.6 explains construction of the Regional Project would require approximately 36 months.

As part of the Project planning efforts, West Basin prepared preliminary cost estimates for the proposed Project that are included in the Ocean Water Desalination Program Master Plan prepared in 2013. This cost estimate is available on the District's website:

[http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan\\_PMP%20Vol%20I%20\(2013\).pdf](http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan_PMP%20Vol%20I%20(2013).pdf)

These preliminary cost estimates provide a planning-level range of total Project costs that include costs for constructing the treatment facility (including the offshore intake and discharge modifications) and the product water distribution system as well as annual operations and maintenance costs. These preliminary estimates provide a sense for the ultimate scale of the costs, but present a wide range to account for uncertainty. As the Project design is refined, including permitting and mitigation commitments, actual Project costs will also become more refined.

West Basin has not finalized its funding portfolio for the Project, but numerous financing methods are available that may include any combination of public-private partnerships (P3), low-interest loans, grant funding, and traditional financing through bonds or capital loans. West Basin anticipates developing the most cost effective approach available. However, the cost of a project is not considered an environmental impact under CEQA unless it results in physical changes to the environment. Because the cost of the Project will not in itself result in physical changes, the Project's effect on customer rates is not considered an environmental impact. But, West Basin recognizes the importance of having a thorough understanding of 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 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. Impacts on rates will depend in part on the financing approach, discussed above.

See also *Master Response: Cost and Rates*.

## Response MOO-7

As noted in the Draft EIR on page 5.1-19, the proposed Project is not proposed in the vicinity of a state designated scenic highway. However, any project located along the coast is likely to impact to some extent highly valued views of the Pacific Ocean, which could impact scenic character or quality as described in the CEQA Guidelines Appendix G. Impacts to visual resources are discussed in Section 5.1, *Aesthetics, Light and Glare* (on pages 5.1-9 through 5.1-29). The proposed Project is located on a site that is zoned for industrial use, immediately adjacent to existing industrial uses on two sides. The beach is located on one side and residential uses are located along the southern border of the site. Views of the site are shielded from some directions by existing uses and topography.

Consistency with applicable plans, policies and regulations is discussed in Section 5.10, *Land Use and Planning*. In particular, consistency with El Segundo plans, policies and regulations is discussed on pages 5.10-29 through 5.10-36. The Draft EIR concludes that the ocean water desalination facility would be consistent with the property's intended use and would comply with the El Segundo Municipal Code (ESMC) Section 15-6B-7, *Site Development Standards*, pertaining to lot area, building/structure height, setbacks, lot frontage, building area, walls/fences, landscaping, lighting, and signage. The proposed Project would also be subject to compliance with ESMC Section 15-2-14, *Landscaping*, which would ensure adequate landscape areas and permanent irrigation facilities are provided on-site, and that areas extending between a building(s) and property lines contain both soft (plantings) and hard (rock, brick, concrete) landscape materials. While the proposed Project is not located within the City of Manhattan Beach, West Basin is sensitive to the needs of Manhattan Beach residents and intends to implement all feasible mitigation measures to reduce impacts on its residents.

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." See *Master Response: Environmental Impacts to the El Porto Community*.

## Response MOO-8

The operational activities associated with the proposed Project are discussed in detail in section 5.2 *Air Quality*. As shown in Table 5.2-12, on page 5.2-35, the unmitigated operational activities at the plant are not anticipated to exceed South Coast Air Quality Management District's (SCAQMDs) regulatory thresholds. Unmitigated emissions are based on a composite operational truck fleet and, therefore, does not require no emissions trucks or vehicles. Construction of the ocean water desalination facility would require the use of mobile equipment, including up to 100 trucks per day. The use of zero emissions vehicles is not practicable for construction.

The following change has been made to Table 5.2-12 to correct a mislabeling error.

**TABLE 5.2-12**  
**ADMINISTRATION BUILDING NATURAL GAS COMBUSTION, WORKER COMMUTE, AND AREA SOURCE EMISSIONS**

Emissions Source	Pollutant (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily Emissions	17	5	6	<1	1	1
SCAQMD Threshold	55	55	550	150	150	55
<i>Is Threshold Exceeded? (Significant Impact?)</i>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

SOURCE: Appendix 3, for assumptions used in this analysis.

## Response MOO-9

Draft EIR Subsection 5.3.4 discusses the impacts to a variety of sensitive biological resources protected by the environmental laws and regulations described in Subsection 5.3.1. As in all environmental resource topic discussions included in this Draft EIR, the regulatory framework informs the impact discussion. For Section 5.3, each impact statement refers to the “plans, policies, or regulations” or other specific regulations as the basis upon which impacts are analyzed.

## Response MOO-10

In addition to the outreach and meetings required of an EIR as outlined in the CEQA Guidelines Section 15082(c), 15083, 15086, and 15087, and summarized in the Draft EIR on pages 2-16 through 2-18, West Basin held additional meetings with local jurisdictions (including the City of El Segundo and Manhattan Beach) and interested parties prior to release of the Draft EIR. These meetings were held to offer interested parties and local governments the opportunity to ask questions about the proposed Project and identify concerns regarding the proposed Project. Proposed Project notification letters were sent inviting Native American groups associated with the Project area and its vicinity to consult on the project pursuant to Assembly Bill 52. The Assembly Bill 52 consultation efforts are summarized in the Draft EIR on page 5.4-20.

Consultation with the State Historic Preservation Office (SHPO) will occur when West Basin seeks funding from the State Revolving Fund which is administered by the State Water Resources

Control Board (SWRCB). The SWRCB will initiate Section 106 of the National Historic Preservation Act, which requires consultation with the SHPO.

### **Response MOO-11**

The use of renewable energy is addressed in several places in the Draft EIR. Section 5.5.4 (page 5.5-17) acknowledges that “(t)he electricity demands of the desalination facility and pump stations would be supplied by SCE, which is subject to the California Renewables Portfolio Standard Program. Over time, the electricity available to the proposed Project will include greater contributions from renewable energy supplies.”

Mitigation Measure GHG-1 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.

### **Response MOO-12**

The effects associated with tsunami impacts, which could be caused by an earthquake originating under the Pacific Ocean, are described in the Draft EIR Section 5.9, *Hydrology and Water Quality*, on page 5.9-37 -38, and analyzed in Impact 5.9-6 on pages 5.9-72 through 5.9-78. Any chemicals used for the proposed Project would be stored in the Chemical/Residuals Handling Building, and as described on page 3-9 of the Draft EIR, all storage and transportation would comply with state and federal requirements. As described in the Draft EIR on page 5.9-72 through 5.9-78, Mitigation Measure HYDRO-1 would ensure that the proposed Project (and the chemicals stored on-site) would not be subject to structural failure caused by future flooding or flood hazards as a result of wave or tsunami run-up.

The Draft EIR Subsection 5.8.2 explains that the two former aboveground fuel oil storage tanks (ASTs) located on the ESGS South Site were removed in 2011 and 2013, and that the site has been capped. Subsection 5.8.2 also presents the known contamination from the off-site Chevron refinery. While West Basin has no responsibility for mitigating the Chevron oil tanks currently located east of Vista Del Mar and further inland from the ESGS sites, the Draft EIR Subsection 5.8.4 explains that residual contamination may be encountered in the soil. Thus, Mitigation Measures HAZ-1 and HAZ-2 would ensure that impacts associated with handling the contaminated materials would be reduced to a less than significant.

### **Response MOO-13**

While the objectives of the proposed Project do not specifically include increased use of renewable energy, West Basin is committed to reducing the Project’s GHG emissions to net carbon neutral. The net carbon neutral approach compares the proposed Project’s new emissions with the existing baseline condition, which includes imported water supplied by the Metropolitan Water District of Southern California (MWD). Mitigation Measure GHG-1 measure requires West Basin to minimize the 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.

## Response MOO-14

The conclusions in the Draft EIR are adequately supported by the technical detail provided for the purposes of determining impacts under CEQA, and demonstrate that the proposed brine discharge would be consistent with Ocean Plan requirements; see *Master Response: CEQA and Ocean Plan Compliance*.

Specific to water quality and brine discharges, as described in detail in the Draft EIR Subsections 5.9.1 and 5.9.4, West Basin will prepare and submit information required by the Ocean Plan when submitting the NPDES discharge permit application as well as the requisite request for a CWC 13142.5(b) determination 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, and the request for 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. These detailed plans will meet the LARWQCB's requirements. Further assessment potentially required during the permitting process will enhance and refine the existing record. No additional mitigation measures would be needed to ensure impacts are sufficiently minimized or avoided.

Monitoring requirements under the California Ocean Plan (Draft EIR Subsection 5.9.1), which West Basin would be subject to, ensure that monitoring will 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.

The ESGS site location was proposed for a number of reasons, including the site's size, topography, and elevation; its prior and existing industrial use; its proximity to the ocean, thereby minimizing source water and brine discharge conveyance infrastructure; access to existing intake and discharge facilities; and proximity to existing product water distribution network, among others. With respect to potential effects on residential areas, please refer to Draft EIR Section 5.1, *Aesthetics* (Impact AES 5.1-1 and Impact AES 5.1-4), Section 5.2, *Air Quality* (Impact AQ 5.2-4, AQ 5.2-5), and Section 5.12, *Noise and Vibration* (Impact NOI 5.12-1). With respect to potential effects related to traffic congestion, please refer to Draft EIR Section 5.15, *Transportation and Traffic* (Impacts TRA 5.15-1 and 5.15-2).

## Response MOO-15

The ESGS site was proposed for the Project's location for a number of reasons, including the site's size, topography, and elevation; its prior and existing industrial use; its proximity to the ocean, thereby minimizing source water and brine discharge conveyance infrastructure; access to

existing intake and discharge facilities; and proximity to existing product water distribution network, among others. With respect to potential effects on residential areas, please refer to Draft EIR Section 5.1, *Aesthetics* (Impact AES 5.1-1 and Impact AES 5.1-4), Section 5.2, *Air Quality* (Impact AQ 5.2-4, AQ 5.2-5), and Section 5.12, *Noise and Vibration* (Impact NOI 5.12-1). With respect to potential effects related to traffic congestion, please refer to Draft EIR Section 5.15, *Transportation and Traffic* (Impacts TRA 5.15-1 and 5.15-2).

### **Response MOO-16**

The California State Water Resources Control Board’s scientific advisory panel reviewed the studies from the Gulf of Oman and other worldwide locations and used the study results in developing the guidelines and regulatory requirements for coastal desalination plants sited in California that are included in the 2015 Ocean Plan Amendment. However, in evaluating and assessing the potential site-specific effects of desalination projects on the marine environment, it is critical to use pertinent and scientifically applicable studies. Although the scientific work on the impacts of desalination projects in the Gulf of Oman, as well as the larger Persian Gulf, clearly demonstrate potential “worst-case” effects of these types of projects, the design and operation of the desalination plants in the Middle East, as well as the oceanographic and marine ecosystems present in the Gulf of Oman and the Persian Gulf, are significantly different than what the Project proposes or what is permissible in California coastal waters.

### **Response MOO-17**

Subsection 5.12.1 Regulatory Framework, Local, includes the requirements of the City of Manhattan Beach, specifically the Manhattan Beach Municipal Code on page 5.12-6. Project consistency with the noise requirements of the Cities of EL Segundo and Manhattan Beach are both discussed in Impact 5.12-1 on page 5.12-17.

### **Response MOO-18**

The proposed Project is not a commercial project; rather it is an industrial project that will be located within an industrially zoned area along the coast. Implementation of the proposed Project would not, in any way, permanently impede the coastal access, as the proposed desalination facility would be located within the boundary of the existing NRG site. During construction, 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.



### **Response MOO-19**

The comment cites language in Subsection 5.16.1, which describes the regulations and laws applicable to the proposed Project, specifically related to secondary standards for drinking water. The treated water will comply with secondary treatment standards.

### **Response MOO-20**

Responses to all comments received on the Draft EIR are included herein.

## Response to Letter MURE: Esteban Murillo

### **Response MURE-1**

The commenter is referred to *Master Response: Cost and Rates* and *Master Response: Non-CEQA Issues*.

## Response to Letter MURS: Steve Murillo

### **Response MURS-1**

CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors. However, evidence of economic and social impacts that do not contribute to, or are not caused by, physical changes in the environment, are not required to be addressed in an EIR (CEQA Guidelines Section 15064(f)(6)). See also *Master Response: Non-CEQA Issues*.

## Response to Letter MURS2: Steve Murillo

### Response MURS2-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

The community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. See also *Master Response: Non-CEQA Issues*.

## Response to Letter MURS3: Steve Murillo

### **Response MURS3-1**

West Basin is governed by an elected five-member Board of Directors and each board member represents a designated division of the district. The Board of Directors will decide if it is in the District's best interest to pursue the proposed Project as part of a diversified water supply portfolio. If a board member does not adequately represent the ratepayer, voters can elect a different representative.

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 warranted.

## Response to Letter MUP: Michelle Murphy and Bob Perkins

### Response MUP-1

West Basin completed a demonstration facility in 2011 as described in the Draft EIR in Section 2, *Introduction*, on page 2-30, which is a separate project than what is described and analyzed in the Draft EIR. The commenter is referred to *Master Response: Non-CEQA Issues*.

### Response MUP-2

While West Basin appreciates the comment, it expresses an opinion and does not speak to the adequacy of the Draft EIR. As a result, this comment has been noted for the record and no further response is necessary.

### Response MUP-3

The Draft EIR Subsection 7.3.1 evaluates the No Project Alternative and concludes that the No Project Alternative would not provide the benefits of a local water supply to fulfill the long-term needs of the region; it would directly conflict with local and regional water supply planning studies that identify the need for a more balanced water portfolio, including seawater desalination. These studies include adopted plans by West Basin, Metropolitan Water District of Southern California (MWD) and the State of California. In particular, the No Project Alternative directly conflicts with West Basin's *Strategic Business Plan* commitment to innovative planning and investments to provide water reliability and drought protection.

Pursuant to CEQA Guidelines Section 15126.6(e)(2), "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Based on the alternatives analysis in the EIR Section 7, West Basin has concluded that the ESGS North Site is the environmentally superior alternative.

### Response MUP-4

Subsection 5.12.2, *Noise Scales and Definitions*, provides a summary of noise fundamentals including terminology, measurement of noise, human hearing of noise and perception of loudness, frequency of human sensitivity, and human perception and response to noise increase on a logarithmic scale. Table 5.12-2 provides noise levels of common noise sources and the corresponding human response range (i.e., with increasing noise levels the response increases as: audible, quiet, intrusive, annoying, very annoying, hearing damage (steady 8-hour exposure), physical discomfort, pain threshold, harmfully loud). Noise is generated by the operation of heavy-duty trucks, backhoes, pile drivers, and other heavy-duty construction equipment, and operation of noisy stationary equipment. These noise sources can be a nuisance to local residents and businesses, or disturb the land use activities of the sensitive receptors; i.e., residential (sleeping), hospital (convalescence), schools (concentration).

The nearest noise-sensitive receptors (residential uses) are located approximately 130 feet from the South Site. Grading and construction would occur along the existing berm, at the southern edge of the property north of 45<sup>th</sup> Street. The greatest construction-related noise impacts would typically occur during the initial site preparation/grading/excavation, which can create the highest levels of noise. Generally, site preparation/grading/excavation has the shortest duration of all

construction phases (up to 15 months for the Local Project). Activities that occur during this phase include demolition, excavation, earthmoving, pile driving, and soils compaction. Operating cycles for the types of construction equipment used may involve 1 to 2 minutes of full-power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

The estimated worst-case potential noise level of the loudest pile driver (impact) rated at 101 dBA at a reference distance of 50 feet (see Draft EIR Table 5.12-10) would attenuate by distance at a rate of 6 dBA per doubling of distance. Thus, at the closest residence (130 feet) the noise level of the loudest pile driver would be 93 dBA, without any mitigation. At greater distance into the residential community, this noise level would be further reduced at the same rate, i.e., 89 dBA at 200 feet, 86 at 400 feet, etc.

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.

Although the proposed Project is not in the city of Manhattan Beach, the proposed Project is located immediately adjacent to Manhattan Beach City limits and within 130 feet of residential units across 45<sup>th</sup> Street from the South Site. Accordingly, potential impacts to these Manhattan Beach residents are evaluated in light of Manhattan Beach’s noise standards. The City of Manhattan Beach, MBMC Chapter 5.48 (Noise Regulations), prohibits the creation of noise within the city that causes the noise level when measured at any residential property to exceed the noise standards; however, MBMC Section 5.48.060 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 daytime standards. Certain land uses are particularly sensitive to noise where excessive noise would disturb their land use activities, such as sleeping at night (residences), concentration (schools), or convalescing (hospitals, rest homes, long-term medical and mental care facilities). Therefore, typically, municipalities exempt construction noise during the daytime hours (i.e., prohibit construction at night when sleeping typically occurs). Implementation of Mitigation Measures NOI-1 through NOI-3 would lessen construction noise and ensure that impacts at sensitive receptors would be minimized. However, even with implementation of all feasible mitigation, the construction noise impact associated with the Local Project is considered significant and unavoidable.

As identified in Impact 5.12-1 for operational noise, the City of El Segundo establishes residential noise standards of 5 dBA above the existing ambient noise level and allows for increases in the noise standard based on duration of the increase. The City of Manhattan Beach provides specific day and night residential noise standards, however, if the ambient noise level exceeds the City’s

noise standards, then the ambient level becomes the exterior noise standard, as shown in Table 5.12-2. As shown in the impact analysis, with mitigation operational noise would not exceed standards, and impacts would be less than significant. See *Master Response: Environmental Impacts to the El Porto Community*.

## Response MUP-5

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 45<sup>th</sup> 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 proposed 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 45<sup>th</sup> 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.

As shown in Table 5.12-6, the measured daytime ambient noise level at the Strand and 45<sup>th</sup> Street was measured at approximately 59.3 dBA Leq. The Draft EIR concludes that temporary noise impacts during construction would be unavoidable, even at this intersection. The residential houses along 45<sup>th</sup> Street that may have a more direct line of sight to the noise generating activities



would also experience significant noise impacts temporarily for construction of the south site. Sound walls would be constructed to minimize impacts.

Although the proposed Project is not in the city of Manhattan Beach, the 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, including Manhattan Beach's nighttime noise standards. As discussed above, because the ambient noise level exceeds Manhattan Beach's noise standard, this ambient level is the exterior noise standard Mitigation Measure NOI-4 would require that West Basin enclose all noise-generating machinery to meet nighttime noise standards for residential uses, which would achieve 40 dBA attenuation. As a result, noise levels at the property line would be reduced to below operational noise standards for residential use. With mitigation, the proposed Project's contribution to the ambient noise would not be perceptible. Therefore, impacts would be less than significant with mitigation.

### **Response MUP-6**

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. 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, the noise impact during construction of the Local Project is considered significant and unavoidable.

Proposed Project construction is temporary and overall, relatively short-term (72 months) with the highest noise levels of pile driving, if necessary, may occur for approximately 3 months. Construction noise is limited to daytime hours, and exempt from the local noise standards. Mitigation Measures NOI-1 through NOI-3 are feasible mitigation for temporary, short-term construction. Sound insulation for residences is mitigation for permanent long-term operational noise.

### **Response MUP-7**

Compliance with the noise ordinance standards would require that the facility control noise sources to levels below existing ambient levels. Therefore, the proposed Project's contribution to the ambient noise would not be perceptible. Impacts would be less than significant with mitigation. Mitigation Measure NOI-2 would require West Basin to document and attempt to resolve all operational noise complaints as soon as possible and minimize activities that would generate noise outside of structures. West Basin would be required to monitor noise levels at the facility to ensure that the proposed Project does not exceed El Segundo's and Manhattan Beach's

noise standards for residential uses, including nighttime noise standards. Mitigation Measure NOI-4 would require that West Basin design the facilities with acoustic treatments sufficient to meet local exterior noise standards.

### **Response MUP-8**

As shown in Table 5.12-6, the measured daytime ambient noise level at the Strand and 45<sup>th</sup> Street was measured at approximately 59.3 dBA Leq. The Draft EIR concludes that temporary noise impacts during construction would be unavoidable, even at this intersection. The residential houses along 45<sup>th</sup> Street that may have a more direct line of sight to the noise generating activities would also experience significant noise impacts temporarily for construction of the south site. Sound walls would be constructed to minimize impacts.

Although the proposed Project is not in the city of Manhattan Beach, the 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, including Manhattan Beach's nighttime noise standards. Compliance with the noise ordinance standards would require that the facility control noise sources to levels below existing ambient levels at the property line. Therefore, the proposed Project's contribution to the ambient noise would not be perceptible. Additionally, Mitigation Measure NOI-2 would require West Basin to document and attempt to resolve all operational noise complaints as soon as possible and minimize activities that would generate noise outside of structures. Impacts would be less than significant with mitigation. At further distance from the proposed Project site boundary, operational noise would attenuate with distance.

### **Response MUP-9**

As noted in the Draft EIR on page 5.1-19, the proposed Project is not proposed in the vicinity of a state designated scenic highway. However, any project located along the coast is likely to impact to some extent highly valued views of the Pacific Ocean, which could impact visual character or quality as described in the CEQA Guidelines Appendix G. Impacts to visual character or quality are addressed in the Draft EIR on pages 5.1-19 through 5.1-25. Specifically related to the South Site which is nearest to 45<sup>th</sup> Street and residential land uses, the visual character of the area north of 45th Street is predominantly industrial. While proposed Project implementation would alter the ESGS South Site's visual character, it would not be altered such that it would become visually incompatible or visually unexpected when viewed in the context of the ESGS and adjacent Chevron facility to the east. The visual character of the area south of 45th Street is predominantly multi-family residential. The desalination facility structures would appear as a low-intensity use consistent with site zoning, and thus could result in greater compatibility with nearby residential uses than ESGS industrial facilities. The proposed Project's visual compatibility with the surrounding areas would be increased through implementation of Mitigation Measures AES-2 through AES-4, which would reduce impacts to a less than significant level.

While the proposed Project is not located within the City of Manhattan Beach, West Basin is sensitive to the needs of Manhattan Beach residents and intends to implement all feasible

mitigation measures to reduce impacts on its residents. As noted on page 5.1-3, Policy LU 5.1 under Goal LU-5 of the Manhattan Beach General Plan indicates, “[r]equire the separation or buffering of residential areas from businesses which produce noise, odors, high traffic volumes, light or glare, and parking through the use of landscaping, setbacks, or other techniques.” Mitigation Measure AES-4 provides the “buffering” required in Policy LU 5.1, where the existing berm that buffers the proposed Project site from residential uses to the south would be re-landscaped to provide visual screening. See *Master Response: Environmental Impacts to the El Porto Community*.

## Response MUP-10

As indicated in Mitigation Measure AES-4, the existing berm that buffers the proposed Project site from residential uses to the south would be re-landscaped to provide visual screening. The physical dimensions/shape of the berm would not be changed; only landscaping (to provide additional visual screening) would be affected.

The Draft EIR does not indicate that the proposed Project “won’t matter because there’s an existing tank on the property that’s 100 feet above sea level.” Rather the Draft EIR describes the context for the proposed Project that includes large tanks. As noted on page 5.1-7 Key View 2 shows “...large aboveground tank features ... visible within foreground views”. Page 5.1-12 indicates that, “[o]nce constructed, the facility would be visible from the neighboring areas including from the beach areas and from the Marvin Braude Coastal Bike Trail, and from motorists and pedestrians on 45th Street, ... The structures housing the treatment processes and administrative offices would be the tallest structures, with roof elevations up to 65 feet above existing ground surface (85 feet above msl). The existing cutter tank that will remain in place is 100 feet above mean sea level (msl) while Vista Del Mar is over 90 feet above msl at this location.” Visual simulations provide viewshed impacts from 45<sup>th</sup> Street (Figure 5.1-8 and 5.1-13) and from the beach south of the site (Figures 5.1-7 and 5.1-12). Views from the Strand (frontage road between residences and the beach) would be similar to the views identified in Figure 5.1-7. The proposed Project would replace heavy industrial uses with light industrial structures. See *Master Response: Environmental Impacts to the El Porto Community*.

## Response MUP-11

The EIR evaluates impacts of the two options (North Site and South Site) for locating the proposed Project at the ESGS facility. The commenter’s recommendation for locating the proposed Project at the North Site is noted and will be forwarded to decision-makers for their consideration in taking action on the Project.

## Response MUP-12

As described in the Draft EIR Section 3.1, the proposed Project proposes to use an ocean water intake system and brine discharge system consisting of repurposing and upgrading existing offshore intake and discharge tunnels. The proposed Project does not propose to use the outdated technology to provide ocean water for the desalination process. The reason coastally sited power plants are no longer allowed to use Once Through Cooling (OTC) is because the volume of water entrained by those facilities was very large and the unscreened intakes created a significant

adverse impact on the marine community. In contrast with the old power plants employing outdated OTC technology, the current desalination Project proposes to take in a daily volume of water that is one fourth the intake volume of the ESGS power plant; the proposed Project would also employ an intake flow rate that will be much slower (<0.5 fps) and employ a screened intake, as prescribed by the 2015 CA Ocean Plan. As such, the only similarity between a coastal power plant and the proposed Project is that they both rely on ocean water in their operations. Despite the safeguards in place for the current Project, as assessed and discussed in detail (Draft EIR pages 5.11-49 through 5.11-61), there remains a potential negative impact of the proposed Project on marine plankton through entrainment. As presented in the Draft EIR Section 5.11, *Marine Biological Resources*, this impact will be mitigated by off-site habitat enhancement commensurate with the estimated impact to the marine ecosystem (Draft EIR pages 5.11-63 through 5.11-64).

### **Response MUP-13**

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 warranted; see *Master Response: Non-CEQA Issues*.

## Response to Letter MYE: Frank Myers

### **Response MYE-1**

The commenter is referred to *Master Response: Non-CEQA Issues* and *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter NEA: Jan Neal

### Response NEA-1

West Basin has not finalized its funding portfolio for the Project, but financing methods may include any combination of public-private partnerships (P3), low interest loans, grant funding, and traditional financing through bonds or capital loans. West Basin recognizes the importance of having a thorough understanding of the costs and benefits of implementing ocean water desalination as a drinking water supply; hence, a study focused on the costs and benefits of proposed Project implementation was initiated in 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 proposed 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. See also *Master Response: Cost and Rates*.

### Response NEA-2

New conveyance infrastructure would convey the desalinated water from the desalination facility to the existing distribution system that delivers potable water to local area and regional supply feeders owned by the Metropolitan Water District of Southern California (MWD), and they are described in Draft EIR Subsection 3.4.1 for the Local Project and in Subsection 3.4.2 for the Regional Project. This comment expresses an opinion about pipeline maintenance costs and does not speak to the adequacy of the Draft EIR. The maintenance of water supply infrastructure in the future will be necessarily similar to existing conditions.

### Response NEA-3

The comment's observation that screening of equipment can block views and the comment's preference for no screening are noted and will be forwarded to decision-makers for their consideration in taking action on the Project. See also *Master Response: Non-CEQA Issues*.

### Response NEA-4

The traffic impacts resulting from the proposed Project would only occur during construction, and are therefore considered temporary. Lane closures would only occur within segments of roadways within which pipelines are installed. Mitigation Measure TRA-1 would minimize the potential for the proposed Project's construction-related traffic to result in traffic delays or impacts on existing circulation patterns and intersection/roadway Level of Service. As soon as the pipeline is installed, the segment of the roadway would be opened. This means that temporary road closures would only occur in incremental segments of roadway, and will not occur along the entire segment of Vista Del Mar.

See also *Master Response: Environmental Impacts to the El Porto Community*.

### Response NEA-5

The operational activities associated with the proposed Project are discussed in detail in Section 5.2, *Air Quality* on page 5.2-35. As shown in Table 5.2-12, on page 5.2-35, the unmitigated operational activities are not anticipated to exceed SCAQMD's recommended significance

thresholds. Therefore, air quality emissions from the operation of the proposed Project would be less than significant.

### **Response NEA-6**

Impacts to wildlife are analyzed for both construction and operation phases of the Local Project and the Regional Project in Draft EIR Subsection 5.3.4, pages 5.3-31 to 5.3-38. No potentially significant impact to terrestrial biology were identified once operational. Mitigation measures apply to the construction phase.

### **Response NEA-7**

The Draft EIR identifies that no local or regional energy conservation plans are directly applicable to the proposed Project, but acknowledges that the 2017 Scoping Plan Update includes high-level objectives and goals intended to reduce energy demand within the state's water sector and describes how the state is currently implementing several targeted agricultural, urban, and industrial-based water conservation, recycling, and water use efficiency programs as part of an integrated water management effort that will help achieve GHG reductions through reduced energy demand within the water sector.

The local climate action plans for LA County and El Segundo include measures for water conservation that are intended to reduce the energy use and GHG emissions associated with the conveyance and consumption of potable water. The 2015 El Segundo Energy Efficiency and Climate Action Plan (EECAP) indicates that community-wide GHG emissions associated with the conveyance and consumption of water constitute less than 0.005 percent of the city's total emissions in 2012. Nonetheless, the EECAP includes a community measure to promote water efficiency actions to enable exceedance of the SB X7-7 standard (reduce water consumption 20 percent by 2020), and municipal measures to implement a water leak detection program and to upgrade or incorporate water-conserving landscapes. Similarly, the 2020 Los Angeles County Climate Action Plan includes a measure to reduce per-capita water use, consistent with SB X7-7, through strategies that the County, in conjunction with local urban water agencies, will implement to promote water conservation throughout the unincorporated areas. The Draft EIR Section 5.5.4 (page 5.5-10) presents the increased energy used by proposed Project construction.

### **Response NEA-8**

The Draft EIR Subsection 5.6.4 evaluates the proposed Project's impacts on soil erosion and loss of top soil. Since construction of the proposed Project would be required to comply with the requirements of the state Construction General Permit, described on pages 5.6-3, 5.6-4, and the El Segundo Municipal Code Chapter 5-4-9, described on page 5.6-6 and 5.6-7, both of which require best management practices to ensure stormwater is managed and erosion is controlled on construction sites, the Draft EIR concludes a less than significant impact during construction, and no impact during operations (see Draft EIR Table 5.6-3).

The Draft EIR Section 5.6, *Geology, Soils, and Seismicity*, page 5.6-11, explains that the nearest active fault to the proposed screened ocean intake and concentrate discharge sites is the Newport-Inglewood Fault Zone, located approximately 6 miles to the east. Since the proposed Project

components are not located on or near any active fault, there would not be any impact to a fault line from pile driving.

## Response NEA-9

Mitigation Measure GHG-1 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. Mitigation Measure GHG-2 requires third-party verification.

West Basin is not proposing on-site solar power generation at this time because it may be more feasible and cost-effective to purchase renewable energy from SCE or another third-party, if and when the proposed Project is approved and constructed. One factor, as explained in the Draft EIR, is that because of SB 350 and California’s RPS program, investor-owned utilities must increase procurement from eligible renewable energy sources to 50 percent of total procurement by 2030,<sup>6</sup> indirect emissions associated with the use of SCE’s electricity will continue to drop through at least 2030 as more and more electricity from renewable power generators is brought onto the grid.

With regards to the comment’s statement regarding the proposed Project’s commitment to “real, actionable energy reductions,” see response to comment MBCH3-58.

With regards to the comment’s statement regarding a preliminary GHG report, see response to SLC-19 regarding the timing of the Energy Minimization and GHG Plan, which notes that the Draft EIR text on page 5.7-30 is modified as follows:

**GHG-1:** West Basin shall prepare an Energy Minimization and GHG Reduction Plan no later than 60 days prior to the start of Project construction activities....

This change presented in the mitigation measure does not result in a decrease in the effectiveness of the proposed measure, does not result in a substantial increase in the severity of the identified impact after mitigation, and does not preclude meaningful review and comment.

## Response NEA-10

Potential impacts from the discharge of brine on water quality are comprehensively assessed under Impact 5.9-2 (Draft EIR Subsection 5.9.4) and impacts on marine biological resources are assessed under Impact 5.11-1 (Draft EIR Subsection 5.11.4). The assessment of impacts to water quality and marine biological resources comprehensively applied and considered the applicable regulations discussed in the associated regulatory setting sections (Draft EIR Subsections 5.9.1 and 5.11.1 *et seq.*), including the Water Quality Objectives of the California Ocean Plan pertaining to salinity and other water quality constituents and pollutants.

<sup>6</sup> With the passing of SB 100, the RPS standard has increased to 60 percent by 2030. SB 100 also directs CARB to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.



Regarding impacts to water quality from the discharge of brine from the proposed Project, the assessment of impacts incorporates the numeric thresholds defined in the Ocean Plan for determining impacts from operation of the Local and Regional Project. Specifically relating to salinity, as described in detail under Impact 5.9-2 (Draft EIR Subsection 5.9.4), the California Ocean Plan limits the increase of salinity of receiving water from desalination plant discharges to a daily maximum of 2 parts per thousand (ppt) above natural background salinity at the boundary of the Brine Mixing Zone (BMZ), defined as the horizontal distance of 100 meters (328 feet) from the point of discharge. As presented in Table 5.9-6 and 5.9-8 (see LARWQCB-30 for further discussion relating to supplemental studies and revisions to the Draft EIR), the Local and Regional Projects would meet the Ocean Plan salinity standard at a maximum of 63 feet and 98 feet from the point of discharge, respectively, for all scenarios modeled. Similarly, for other water quality constituents, the analysis of water quality impacts incorporates the numeric water quality objectives defined in the Ocean Plan, and summarized in the Draft EIR Table 5.9-2. As discussed in detail under Impact 5.9-2, brine discharges would not cause or contribute to an exceedance of relevant water quality standards. The assessment of water quality impacts from the discharge of brine (Draft EIR Subsection 5.9.4) was incorporated into the analysis of impacts on marine biological resources potentially occurring due to changes in receiving water quality within the mixing zone at the outfall diffuser. As discussed in detail in Draft EIR Subsection 5.11.4 (page 5.11-56), because water quality constituents would not exceed existing background levels at the edge of the Zone of Initial Dilution (ZID), the discharge of brine would not be expected to pose any risk to marine habitats and taxa, including special-status fish, marine mammals, and sea turtles.

### **Response NEA-11**

The proposed study on entrainment and shear stress mortality on planktonic organisms identified in Mitigation Measure BIO-M2 is intended to provide additional “real-world” information on the potential magnitude of entrainment by the intake as well as by the discharge plume. As presented in the Draft EIR Section 5.11, *Marine Biological Resources*, the effects of power plant Once Through Cooling (OTC) entrainment have been studied for the past 30+ years. The data from these entrainment studies provide substantial information on the potential magnitude of entrainment under high volume, high flow rate, and unscreened intake systems. Because of significant differences in design and operation of the proposed Project and these previously studied coastal power plants, many questions remain concerning precisely what planktonic taxa are entrained in a 1mm wedgewire screened intake operating at <0.5 fps, and the efficiency of this on reducing entrainment. The proposed Project has committed to mitigating these potential losses through off-site habitat restoration at an appropriate level, based on calculations of potential ecosystem impacts, as directed by the State Water Resources Control Board (SWRCB). But as illustrated in the discussion of potential Project entrainment impacts (Draft EIR pages 5.11-49 through 5.11-61), the potential effects on the ecosystem are uncertain and the proposed studies will provide scientific information that will inform and reduce this uncertainty.

### **Response NEA-12**

The Traffic Control Plan, which is required by Mitigation Measure TRA-1, would minimize the potential for the Project’s construction-related traffic to result in traffic delays or impacts on

existing circulation patterns and intersection/roadway Level of Service. Impacts would be reduced to a less than significant level. There would be no increase to safety hazards as disclosed on page 5.15-30 of the Draft EIR. While public input is not typically involved in preparation of a Traffic Control Plan, all local jurisdictions within which roadway impacts will occur will be consulted regarding encroachment into their rights-of-way. In this way, the local jurisdictions whose responsibility it is to maintain safety on local roadways will be involved in the planning process.

### **Response NEA-13**

Regulations do not currently exist that would allow for Direct Potable Reuse (DPR) within the West Basin service area. However, as currently envisioned, future DPR regulations may specify a blending requirement, where highly treated water would be blended with potable water for treatment prior to distribution. Interestingly, the implementation of the proposed Project may position West Basin to support future DPR through use of the desalinated ocean water as a raw water source for blending when such regulations are in place. West Basin supports development of DPR as a part of a diversified water supply portfolio for the region. Development of the ocean water desalination would strengthen West Basin's ability to implement DPR in the future via raw water augmentation.

### **Response NEA-14**

The 2015 Urban Water Management Plan (UWMP) was prepared in compliance with Water Code Section 10608.36 and California's Urban Water Management Planning Act (Act) (Water Code Sections 10610 through 10657). Those provisions require that every urban water supplier that provides municipal and industrial water to more than 3,000 customers (or supplies more than 3,000 acre-feet per year) prepare and adopt a UWMP every 5 years. The Act requires urban water suppliers to describe and evaluate sources of water supply, efficient uses of water, demand management measures, implementation strategy and schedule, and other relevant information and programs. In addition, the Act requires reporting agencies to describe their water reliability under single-dry-year, multiple-dry-year, and average-year conditions, with projected information in 5-year increments for 20 years. The water reliability analysis requires urban water suppliers to identify projected supplies to meet these demands. As with West Basin's previous Plans (1995, 2000, 2005, and 2010), the 2015 UWMP builds upon the goals and progress made in the preceding UWMP. The 2015 UWMP provides the most current planning projections of supply capability and demand developed through a collaborative process with Metropolitan Water District of Southern California (MWD), and it continues to serve as West Basin's master plan for reliable water supply and resources management.

The 2015 UWMP details how West Basin proposes to manage its water supplies and demands under all hydrology conditions, and demonstrates how West Basin proposes to meet its service area's retail demands and provide long-term water reliability and security over the next 25 years (see Draft EIR Subsection 2.3.2). West Basin as a public water wholesaler manages its own water supply portfolio, and the UWMP is where West Basin's water planning process is presented. See also *Master Response: Water Supply Alternative*.

## Response NEA-15

Although West Basin appreciates the concern, the comment 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 warranted.

## Response NEA-16

As noted in Draft EIR Subsection 7.2.1, the direct introduction of advanced treated recycled water into the treated drinking water distribution system to produce a Direct Potable Reuse (DPR) supply faces the greatest challenges in regulation development, technology development, and public health safeguards. The implementation of the proposed Project would allow West Basin to position itself to consider DPR through raw water augmentation for blending when such regulations are in place. The absence of the proposed Project (the No Project Alternative) makes this alternative infeasible and too speculative for obtaining the goal of 21,500 AFY of potable drinking water.

## Response NEA-17

The Draft EIR Section 2.10 presents the Project Development and Background, and, in that context, Subsection 2.10.1 describes the West Basin Pilot Project and Subsection 2.10.2 describes the Ocean Water Desalination Demonstration Facility and Water Education Center. Subsection 2.10.1 explains that the Pilot Project identified that membrane pretreatment followed by RO effectively treated seawater to meet West Basin's potable water standards and was successful in identifying optimal design and operating parameters for implementing desalination within its service area. Subsection 2.10.2 explains that the Demonstration Facility's specific objectives were to develop data for the permitting, design, construction, and operation of West Basin's proposed full-scale desalination facility. The Demonstration Facility ultimately provided field data for optimizing the proposed Project design so that it could produce high-quality potable water in accordance with public health safeguard while minimizing environmental impacts. All references cited in the Draft EIR are available by request; many of the studies, including the Pilot Program Final Comprehensive Report, and the Demonstration Project Final Report, are available online at: <http://westbasindesal.com/research-and-planning.html>.

## Response NEA-18

The Draft EIR Section 2.10 presents the Project Development and Background, and in that context, Subsection 2.10.3 specifically describes the Harmful Algal Bloom and Marine Biotoxin Study. In an effort that was partially funded by DWR under Proposition 50, West Basin prepared the *Stormwater and Marine Biotoxin Monitoring Final Report* (Trussell Technologies 2009) and the associated monitoring activities identified stormwater input and harmful algal bloom effects on the desalination process at the West Basin Pilot Project. All references cited in the Draft EIR are available by request; many of the studies, including the *Stormwater and Marine Biotoxin Monitoring Final Report*, are available online at: <http://westbasindesal.com/research-and-planning.html>.

## Response NEA-19

The Draft EIR Section 2.10 presents the Project Development and Background, and in that context, Subsection 2.10.9 specifically describes the Intake Biofouling and Corrosion Study. In 2016, West Basin partnered with Metropolitan Water District of Southern California (MWD) and commissioned an Intake Biofouling and Corrosion Study to identify suitable materials that are corrosion resistant and anti-biofouling to field-demonstrate their long-term corrosion and anti-biofouling performance. The study identified two main types of metals: copper-nickel alloys and steel alloys; unfortunately, as noted in the Draft EIR Table 2-2, two of the samples (the 90-10 Cu-Ni alloy samples) were lost at sea after collecting one year of data. The study had ample data to conclude the Copper:Nickel alloy samples had significantly less weight change than the stainless steel samples. See also Draft EIR Appendix 4B: Literature Review on Long Term Corrosion and Biofouling Resistance of Copper Nickel Alloys and Stainless Steels for Marine Applications; Technical Memorandum: Dissolution Estimate of Copper:Nickel Corrosion from Wedgewire Screens.

## Response NEA-20

The Draft EIR Subsection 5.9.1 explains that the SWRCB defines subsurface intakes as the preferred technology for desalination facility water intake design. However, surface water intakes are allowed where subsurface intakes are found to be infeasible (SWRCB 2015). As explained and summarized in the Draft EIR Subsection 2.10.10, West Basin has extensively evaluated the technical, economic, social and environmental feasibility of incorporating subsurface seawater intake (SSI) systems into Project design. In 2015, West Basin initiated a site-specific feasibility study to evaluate using a SSI at the ESGS facility; see Draft EIR Appendix 2. As explained in the Draft EIR Subsection 7.2.3, the site specific study outlined the local geology and proximity to subsurface ocean water and evaluated numerous technologies that could access subsurface ocean water and concluded that due to the local geology, existing coastal development, subsurface water quality, potential for interference with the operation of the West Coast Seawater Barrier Project, and untested expensive technology, subsurface intakes would be infeasible. In response to this and similar comments on the Draft EIR, West Basin has prepared a Supplemental Subsurface Intake Feasibility Study (Final EIR Appendix 13); see *Master Response: Supplemental Studies*.

## Response NEA-21

As explained in the Draft EIR Section 5, *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). Since project-level details were known for the majority of components analyzed in the Draft EIR, project-level analysis is appropriate where used in the Draft EIR.

The commenter is referred to *Master Response: Water Supply Alternatives* and *Master Response: Cost and Rates*.



## Response to Letter NEE: Sean Neel

### Response NEE-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved. The commenter is referred to *Master Response: Non-CEQA Issues*.

## Response to Letter NEL: Tennyson Nelson

### Response NEL-1

CEQA Guidelines Appendix F, Energy Conservation, does not provide specific thresholds (such as Zero Net Energy [ZNE]) for energy demand increases. In accordance with Appendix F of the CEQA Guidelines, and as described in Draft EIR Section 5.5.1, the proposed Project would result in a significant impact with regard to energy if the proposed Project would, among other things, conflict with adopted energy conservation plans. The Draft EIR identifies that no local or regional energy conservation plans are directly applicable to the proposed Project, but does identify the 2017 Scoping Plan Update as having applicable high-level objectives and goals intended to reduce energy demand within the state's water sector in the context of developing "more reliable water supplies for people, agriculture, and the environment, provided by a more resilient, diversified, sustainably managed water resources system." The Draft EIR concludes on page 5.5-22 that the increase in energy demand associated with the Project would represent 0.15 percent of the electricity use in Los Angeles County and would not be a significant or wasteful increase. On page 5.5-24 the Draft EIR states that the Local Project's estimated electrical consumption would account for approximately 0.08 percent of SCE's projected electricity sales. If using the lower baseline case provided in the comment, this percentage would be closer to 0.1 percent, still a small percentage of SCE sales. See responses to comments MBCH3-43, MBCH3-44, MBCH3-46, EOGB-4, EOGB-5, LAW2-5.

## Response to Letter NOL: Phoebe Nolan

### Response NOL-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved. The commenter is referred to *Master Response: Non-CEQA Issues*.



## Response to Letter NOR: Robert Norrie

### **Response NOR-1**

The commenter is referred to *Master Response: Non-CEQA Issues*, *Master Response: Water Supply Alternatives*, and *Master Response: Cost and Rates*.

## Response to Letter ORA: Kelly Oram

### **Response ORA-1**

The commenter is referred to *Master Response: Water Supply Alternatives* and *Master Response: Non-CEQA Issues*.

## Response to Letter ORT: Evan Ortega

### **Response ORT-1**

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*.

## Response to Letter PAN: Jerry Pancake

### **Response PAN-1**

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*.

### **Response PAN-2**

The Draft EIR Subsection 7.2.1 considered a range of water supply 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*.

### **Response PAN-3**

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*.

## Response to Letter PAN2: Jerry Pancake

### **Response PAN2-1**

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*.

### **Response PAN2-2**

The Draft EIR Subsection 7.2.1 considered a range of water supply 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*.

## Response to Letter PAR: Kathleen Parker

### Response PAR-1

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 warranted; see *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter PER: Cindy Perelson

### Response PER-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

## Response to Letter PHE: Andrew Phelps

### Response PHE-1

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 warranted; see *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.



## Response to Letter PHE2: Andrew Phelps

### **Response PHE2-1**

This comment letter states that a separate comment letter from Colleen Young provides better comments and then copies Ms. Young's comments verbatim. The reader is directed to the responses to comment for Colleen Young's comment letter (response to comment YOCO-1 through YOCO-16).

## Response to Letter PHI: Wendy Phillips

### Response PHI-1

The Draft EIR Subsection 5.11.4 explains on pages 5.11-49 through 5.11-61 that the potential effect of planktonic entrainment on marine ecosystems represents a potentially significant impact. However, the implementation of Mitigation Measure BIO-M2 would offset any potential marine ecosystem effects of Project-related entrainment and would reduce the potential impact to less than significant. The comment's concern about the creation of a "zone of extreme toxicity" is unsubstantiated by any scientific evidence. The Draft EIR extensively assessed the effects of the brine discharge (Draft EIR Section 5.9 on pages 5.9-49 through 5.9-61), as well as the potential effect of elevated brine concentrations and elevated contaminants in the discharge water on marine taxa (Draft EIR pages 5.11-56 through 5.11-58). Both the Hydrology and Water Quality (Section 5.9) and Marine Biological Resources (Section 5.11) analyses determined that the discharged volume of elevated brine would affect an extremely small areal extent, reaching background (ambient) salinity levels between 45 and 63 feet from the diffuser for the Local Project and between 70 and 98 feet for the Regional Project for all scenarios modeled, and that it posed no identifiable toxicity threat to marine biota for all scenarios modeled.

### Response PHI-2

The Draft EIR Subsection 7.2.1 considered a range of water supply 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*. While West Basin appreciates the comment, it expresses an opinion and does not speak to the adequacy of the Draft EIR; see also *Master Response: Non-CEQA Issues*.

### Response PHI-3

The comment provides a summary of the proposed Project as proposed and analyzed in the Draft EIR. The comment does not specify any deficiencies in the analysis included in the Draft EIR. As a result, this comment has been noted for the record. However, it should be noted that ferric chloride is a coagulant that consolidates suspended solids in the waste stream that are settled out before the decanted waste stream is discharged back to the ocean. As noted in Draft EIR Subsection 3.4.1, the clarified effluent would either be pumped to the head end of the desalination plant (i.e., washwater recycling) or it would mix with RO brine and be discharged to ocean.

### Response PHI-4

The cost of a project is not considered an environmental impact under CEQA unless it results in physical changes to the environment. Since the cost of the proposed Project will not in itself result in physical changes, the proposed Project's effect on customer rates is not required to be considered in the Draft EIR. However, West Basin recognizes the importance of having a thorough understanding of the costs and benefits of proposed Project implementation and initiated a rate impact analysis in 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 proposed Project implementation, and 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. See also *Master Response: Cost and Rates*.

### **Response PHI-5**

The comment provides a summary of concerns that are subsequently elaborated on in the comment letter. Responses to these comments are addressed in response to comments PHI-6 through PHI- 23.

### **Response PHI-6**

See response to comment PHI-1; the effluent discharged by the proposed Project would not create zones of toxicity on the seafloor. Also, the Hyperion water Reclamation plant does not currently include any known brine discharges. Their National Pollutant Discharge Elimination System (NPDES) permit does include a standard limit on the salinity of their discharge.

Hyperion's NPDES permit is available at:

[https://www.waterboards.ca.gov/losangeles/board\\_decisions/adopted\\_orders/docs/2171\\_R4-2010-0071\\_WDR\\_PKG.pdf](https://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/docs/2171_R4-2010-0071_WDR_PKG.pdf).

### **Response PHI-7**

See response to comment PHI-1; the effluent discharged by the proposed Project would not create a zone of extreme toxicity. As discussed in detail in the Draft EIR Subsection 5.11.4 (page 5.11-56), because water quality constituents would not exceed existing background levels at the edge of the Zone of Initial Dilution (ZID), the discharge of brine would not be expected to pose any risk to marine habitats and taxa, including special-status fish, marine mammals, and sea turtles because of the small percentage of total open water habitat contained within the ZID and the limited exposure duration.

West Basin conducted a Demonstration Project, integrating the results of a previous Pilot Project (discussed in the Draft EIR Subsection 2.10.2, page 2-30). The Demonstration Project included a detailed study of the effects of brine discharge on local marine life from salinity and toxicity to support permitting, design, construction, and operation of West Basin's proposed full-scale desalination facility. Water quality evaluations of operational brine discharges conducted as part of the Pilot and Demonstration Projects (SPI 2017, 2018; incorporated by reference into the analysis of impacts presented in Draft EIR Subsection 5.9.4 and available as part of the Project Administrative Record and online at <http://westbasindesal.com/research-and-planning.html>) determined that the majority of constituents in the brine for which there is a numeric water quality objective (Draft EIR Table 5.9-2, page 5.9-8) complied with Ocean Plan water quality objectives. None of the constituents were determined to exceed existing background levels in Santa Monica Bay following discharge and dilution/dispersion associated with the proposed diffuser.

The Draft EIR acknowledges that the Los Angeles Regional Water Quality Control board (LARWQCB) may require additional information for the California Water Code (CWC) 13142.5(b) determination and NPDES permit. Additional modelling and ultimately monitoring for bioaccumulation of discharge constituents would be conducted if required under the permit conditions. However, for purposes of determining potentially adverse impacts to ocean water

quality and marine life, the Draft EIR adequately presents substantial evidence based on years of pilot testing and Demonstration Project testing that suggests bioaccumulation would not present significant impacts.

### **Response PHI-8**

The Draft EIR Subsection 5.9.1 explains that the State Water Regional Control Board (SWRCB) defines subsurface intakes as the preferred technology for desalination facility water intake design. However, surface water intakes are allowed where subsurface intakes are found to be infeasible (SWRCB, 2015). As explained and summarized in the Draft EIR Subsection 2.10.10, West Basin has extensively evaluated the technical, economic, social and environmental feasibility of incorporating subsurface seawater intake (SSI) systems into Project design. In 2015, West Basin initiated a site-specific feasibility study to evaluate using a SSI at the El Segundo Generating Station (ESGS) facility; see Draft EIR Appendix 2. As explained in the Draft EIR Subsection 7.2.3, the site specific study concluded that due to the local geology, existing coastal development, subsurface water quality, potential for interference with the operation of the West Coast Seawater Barrier Project, and untested expensive technology, subsurface intakes would be infeasible. In response to this and similar comments on the Draft EIR, West Basin has prepared a Supplemental Subsurface Intake Feasibility Study (Final EIR Appendix 13); see *Master Response: Supplemental Studies*.

The Draft EIR analysis of entrainment impacts is presented in the Draft EIR Subsection 5.11.4 and is not based on a statement that the potential effects would be less than that caused by the existing power plant. The proposed intake system will operate at significantly lower intake flow rates (<0.5fps) than the power plant did and will employ 1-mm wedgewire screens. These two updates result in key differences in the operation between the existing ESGS Once Through Cooling (OTC) system and the proposed Project; as a result of the updates, impingement of all adult and larval fish is predicted to be eliminated. It should also be noted that both of these updates are required by the California SWRCB in its Ocean Plan Amendment (OPA), dated 2015. Finally, information on potential entrainment impacts, including species potentially entrained and the potential effect of that entrainment on marine ecosystems, is presented in the Draft EIR Subsection 5.11.4 on pages 5.11-49 through 5.11-61.

### **Response PHI-9**

The use of subsurface intakes was investigated for feasibility as part of Project design. Subsurface intakes were assessed as part of the West Basin Ocean Water Desalination Program Master Plan (Arcadis, 2013) for the El Segundo Generating Station (ESGS) and Redondo Beach sites, and they were found to be infeasible for the proposed Project. In-depth technical and geological analyses and groundwater modeling for the ESGS site were also conducted as part of the Subsurface Intake Feasibility Study presented in Appendix 2A, Feasibility Assessment of Subsurface Seawater Intakes. As part of the preparation of the Final EIR, West Basin prepared a supplemental study that expands upon the Subsurface Intake (SSI) study provided in the Draft EIR, and responds to the concerns expressed by this, and other comments on the Draft EIR. The findings of this supplemental study support West Basin's conclusions in the Draft EIR, and provide support for future regulatory decisions. See *Master Response: Supplemental Studies*.

The Project proposes to utilize screened open water intakes as described in EIR Subsection 3.4.1. The quantification of impacts to marine life from the proposed Project intake and discharge is presented in Draft EIR Subsection 5.11.4. The comment is not clear as to what intake alternatives might be included in such a comparative analysis.

### **Response PHI-10**

West Basin is proposing to develop a 20 million gallons per day (MGD) Local Project desalination facility. As described in the Draft EIR Subsection 3.4.1, the Local Project would require 45 MGD of ocean water to meet the 20 MGD product water volume. A Reduced Capacity Alternative is evaluated in the Draft EIR Subsection 7.3.3 and as explained, the Reduced Capacity Alternative would not substantially reduce the impacts of the proposed Project and would not as effectively reduce West Basin's reliance on imported water as would the proposed Project. As described in Draft EIR Section 5.9 and 5.11, the impact from the proposed Project resulting from the screened intake would be less than significant with mitigation, and the brine discharge meets State regulatory requirements of not exceeding 2 ppt well within 100 meters of the discharge. See Draft EIR pages 5.9-49 through 5.9-61.

### **Response PHI-11**

See response to comment PHI-9.

### **Response PHI-12**

The Draft EIR includes an analysis of impacts from nearby public viewpoints, such as the Marvin Braude Coastal Bike Trail and from motorists and pedestrians on 45<sup>th</sup> Street. Photo simulations were prepared for selected Key View locations to demonstrate the degree of change that would result from proposed Project implementation from public vantage points (see Figures 5.1-5 through 5.1-22). Numerous visual simulations from the public vantage points along the beach and in northern Manhattan Beach are included in the Draft EIR to disclose visual impacts of the proposed Project, and are accompanied by textual descriptions of the proposed changes. Most notable is Figure 5.1-7 and the accompanying text on page 5.1-37, which states that: "The proposed new ocean water desalination facility at the ESGS South Site would not result in any significant view blockage of beach areas or ocean views; refer to Figure 5.1-7. Views to some landscaped slopes would be replaced with Local Project ocean water desalination facility structures. The proposed structures would appear to encroach closer to beach areas when compared to the existing condition." The text explains that while new structures would be visible from the beach, view blockage of the beach or ocean views would not occur as a result of the proposed Project.

The Draft EIR describes the existing condition at the proposed Project site and surrounding area in order to establish the visual context and environmental baseline against which proposed Project impacts are analyzed. This baseline condition includes the large tanks referenced by the comment. As noted on page 5.1-7, Key View 2 shows "...large aboveground tank features ... visible within foreground views". Page 5.1-12 indicates that, "[o]nce constructed, the facility would be visible from the neighboring areas including from the beach areas and from the Marvin Braude Coastal Bike Trail, and from motorists and pedestrians on 45th Street, ... The structures housing the treatment processes and administrative offices would be the tallest structures, with

roof elevations up to 65 feet above existing ground surface (85 feet above mean sea level [msl]). The existing cutter tank that will remain in place is 100 feet above msl while Vista Del Mar is over 90 feet above msl at this location.” Visual simulations provide viewshed impacts from 45<sup>th</sup> Street (Figure 5.1-8 and 5.1-13) and from the beach south of the site (Figures 5.1-7 and 5.1-12). Views from the Strand (frontage road between residences and the beach) would be similar to the views identified in Figure 5.1-7. The proposed Project would replace heavy industrial uses with light industrial structures. See *Master Response: Environmental Impacts to the El Porto Community*.

### **Response PHI-13**

Regarding the comment’s concern that the environmental impacts of ocean desalination are not justified when the more cost-effective alternative of aggressive water conservation is available, see *Master Response: Greenhouse Gas Emissions and Energy Use* and *Master Response: Water Supply Alternatives*.

### **Response PHI-14**

The Draft EIR Table 7-2 presents the results of the initial screening of alternatives. An economic impact analysis is not appropriate under CEQA unless physical changes to the environment attributable to the project could occur as a result of an economic impact. 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, while less expensive than desalination, does not meet the objective of diversification; it’s more of the same and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought. 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. See *Master Response: Water Supply Alternatives* and *Master Response: Cost and Rates*.

### **Response PHI-15**

West Basin is a water wholesaler. As noted correctly by the comment, West Basin’s water retailers control tiered pricing structures, not West Basin.

### **Response PHI-16**

The Draft EIR Subsection 7.2.1 explains that West Basin’s retail water agencies are required to comply with SB X7-7 (Water Conservation Act of 2009) water use reductions targets, while West Basin is not. However, West Basin uses its 2015 Urban Water Management Plan (UWMP) as a “Regional Alliance” UWMP to establish regional demand reduction targets for five of its eight retail agencies.<sup>7</sup> West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio.

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<sup>7</sup> West Basin’s Regional Alliance partners include the California Water Service (Hawthorne Region), City of El Segundo, City of Lomita, City of Manhattan Beach, and the Los Angeles County Waterworks District #29.

## Response PHI-17

See response to comment PHI-16.

## Response PHI-18

How any one retail customer conserves water in the home is an individual choice. Choices may be behavioral (taking shorter showers) or require hardware changes (installing a composting toilet or converting turf to a more sustainable landscape). West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. The expansion of an existing conservation program does not meet the objective of water supply diversification and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought.

## Response PHI-19

West Basin is committed to continued water use efficiency programs and will continue to pursue conservation as a component of the water supply portfolio. However, the expansion of an existing conservation program does not meet the objective of diversification. Please see *Master Response: Water Supply Alternatives*, and response to comments PHI-14 through PHI-18.

## Response PHI-20

The commenter's concern with the operation of other regional desalination facilities, particularly the Claude Lewis Carlsbad Desalination Plant, 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 warranted.

## Response PHI-21

The commenter's concern with the operation of other regional desalination facilities, particularly the Redondo Beach Desalination Demonstration Project, does not specify any deficiencies in the analysis included in the Draft EIR. The incident involved water quality of the aquarium fish tanks. As a result, this comment has been noted for the record and no further response is warranted. For more info regarding the referenced incident, see page 4-4 of the *Ocean Water Desalination Demonstration Project*

[http://westbasindesal.com/assets/Documents%20and%20Files/Project%20Materials/technical-studies/OWDDF\\_Final%20Report\\_032818.pdf](http://westbasindesal.com/assets/Documents%20and%20Files/Project%20Materials/technical-studies/OWDDF_Final%20Report_032818.pdf).

Furthermore, the Draft EIR discusses the treatment and handling of on-site chemicals (including chlorine) in Subsection 3.4.1 (Project Description); Draft EIR Subsection 5.8.4 (Hazards and Hazardous Materials) discusses the potential construction and operational impacts associated with hazardous materials, and; Subsection 5.11.4 (Marine Biological Resources, on page 5.11-60) discusses the potential effects on marine organisms from the chlorine discharges.

## Response PHI-22

West Basin is required by CEQA to evaluate the impacts of construction and operation of the proposed Project on the environment. The Draft EIR fully analyzes those impacts. The incident cited by the comment regarding the Redondo Beach Desalination Demonstration Project involved

water quality of the aquarium fish tanks, which has nothing to with the proposed desalination process analyzed under CEQA in this EIR. The proposed Project's ocean discharge would be disinfected and de-chlorinated prior to discharge, and covered under an NPDES discharge permit with receiving water quality objectives. Although West Basin appreciates the concerns, the comment does not specify any deficiencies in the Draft EIR analysis. As a result, this comment has been noted for the record and no further response is warranted.

### **Response PHI-23**

The comment is noted for the record.



## Response to Letter POL: Linda Pollard

### **Response POL-1**

While West Basin appreciates the comment, it does not address the adequacy of the environmental analysis included within the Draft EIR. No further response is warranted.

## Response to Letter POM: Joie Pompilio

### Response POM-1

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 warranted; see *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter POP: Mary Pope

### Response POP-1

Although the Project is proposed to be located in the city of El Segundo, the commenter is correct in noting that the proposed Project is on the border of Manhattan Beach city limits. As discussed in the EIR, the ESGS South Site is within 130 feet of residential units across 45<sup>th</sup> Street, and the ESGS North Site is approximately 750 feet north with the intervening property remaining undeveloped. Accordingly, potential noise impacts to these Manhattan Beach residents are evaluated in the Draft EIR in light of Manhattan Beach's noise standards (See Section 5.12, *Noise*). Traffic impacts in the Draft EIR are analyzed based on the circulation system, which covers Manhattan Beach (see Section 5.15, *Transportation and Traffic*). Coastal access at the proposed Project site is covered in Section 5.14, *Recreation*, and chemical spills are assessed in Section 5.8 *Hazards and Hazardous Materials*. The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter RAM: John Ramirez

### Response RAM-1

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter REN: Michele Reniche

### **Response REN-1**

The commenter is referred to *Master Response: Non-CEQA Issues* and *Response: Cost and Rates*.

## Response to Letter RIZ: Joseph Rizzi

### Response RIZ-1

Ocean water desalination that utilizes the pressure of the ocean to force seawater through membranes could result in an energy savings when compared to the proposed Project. But Santa Monica Bay is characterized by a gently sloping (approximately 0.5°) continental shelf (see Draft EIR Subsection 5.9.2 on page 5.9-28) and in order to achieve a pressure of 814 psi at a depth of 1,800 feet as described by the comment, the proposed facility would need to be located approximately 13 miles offshore. While it is unclear if the “constant free trickle of salt FREE water” would be scalable to the needs of West Basin, energy use might be the only environmental benefit of such a proposal. While the proposed Project anticipates returning the salts that came from the ocean to the ocean, the salts that are removed from the ocean at 1,800 feet offshore would simply remain in the ocean. While impacts to coastal residents might be minimized, impacts to the ocean floor would be maximized; it is not clear from the comment how it would result in positive impacts to ocean plants or sea creatures. The pipelines from the offshore location to the mainland would certainly traverse several active shipping lanes, which could cause impacts and conflicts during construction, and perhaps during operation. The concept of natural desalination is intriguing, but its utility at this scale is speculative at this time.

## Response to Letter RIZ2: Joseph Rizzi

### **Response RIZ2-1**

See response to comment RIZ-1.

## Response to Letter SAB: Terri Sabosky

### **Response SAB-1**

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*.



## Response to Letter SAC: Amanda Sackett

### **Response SAC-1**

The comment refers to a request for permit extension; West Basin assumes this is referring to a request for an extension on the Draft EIR public comment period. 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. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period.

### **Response SAC-2**

Board members are available to receive public comment at every scheduled board meeting. Board members will be provided with all comments, and responses to comment received on the Draft EIR, as they consider certification of the EIR and Project approval. See also response to comment SAC-1

## Response to Letter SALA: Steve Salas

### Response SALA-1

The Draft EIR Subsection 7.2.1 evaluates a range of water supply alternatives, including recycling, and explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Nor would it eliminate the need for additional water supply diversification afforded by ocean water desalination. See *Master Response: Water Supply Alternatives*.

## Response to Letter SALO: Laura Salonen

### **Response SALO-1**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* for a discussion of noise, air quality, and traffic impacts to the El Porto Community.

The commenter is referred to Section 7 of the Draft EIR which includes a lengthy discussion of proposed Project site alternatives considered.

## Response to Letter SBE: Angelina Sberna

### **Response SBE-1**

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 warranted. The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.

## Response to Letter SCHR: Matthew Schroeder

### **Response SCHR-1**

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* for a discussion of noise, air quality, and traffic impacts to the El Porto Community.

## Response to Letter SCHU: Janice Schultz

### Response SCHU-1

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 warranted; see *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter SCHUJ: Juli Schulz

### Response SCHUJ-1

West Basin is a recognized leader in recycled water production, conservation and education programs. Since 1995, West Basin has treated over 200 billion gallons of secondary effluent at Edward C. Little Water Recycling Facility (ECLWRF) and other satellite facilities for a range of water reuse applications, including producing advance treated recycled water for indirect potable water and industrial uses. The Draft EIR Subsection 7.2.1 evaluates a range of water supply alternatives, including the increased of non-potable recycling alternative, and explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Nor would it eliminate the need for additional water supply diversification afforded by ocean water desalination.

## Response to Letter SCHUV: Vic Schulz

### **Response SCHUV-1**

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 warranted; see *Master Response: Non-CEQA Issues*.



## Response to Letter SEN: Gary Senser

### Response SEN-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter SHA: Elias Shamos

### Response SHA-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

## Response to Letter SIE: Bob Sievers

### Response SIE-1

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter SIE2: Bob Sievers

### **Response SIE2-1**

See response to comment SIE-1.

## Response to Letter SIEN: Nate Sievers

### **Response SIEN-1**

CEQA requires lead agencies to consider environmental effects associated with project approvals, but does not require any financial impact analysis regarding either the cost of the project itself, or potential impacts to property values for any parcels or communities adjacent to the project site.

This comment also asks Project cost and liability questions that do not speak to the adequacy of the Draft EIR. See *Master Response: Non-CEQA Issues*.

## Response to Letter SLO: Marilyn Slominski

### Response SLO-1

The comment expresses concern about air quality, traffic, and noise. Air quality impacts are discussed in the Draft EIR in Section 5.2 beginning on page 5.2-22. Noise impacts are discussed in the Draft EIR in Section 5.12 on page 5.12-14. Traffic impacts are discussed in the Draft EIR in Section 5.15 on page 5.15-17. The Draft 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. All other impacts were found to be less than significant with mitigation. Although West Basin appreciates the concerns raised, the comment 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: Environmental Impacts to the El Porto Community*.

### Response SLO-2

CEQA requires lead agencies to consider environmental effects associated with project approvals, but does not require any financial impact analysis regarding either the cost of the project itself, or potential impacts to property values for any parcels or communities adjacent to the project site. Nevertheless, the community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility (desalination) in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property or rental values in the adjacent communities. See *Master Response: Non-CEQA Issues*.

### Response SLO-3

Air quality impacts are discussed in the Draft EIR in Subsection 5.2.4 beginning on page 5.2-22. Noise impacts are discussed in the Draft EIR in Subsection 5.12.4 beginning on page 5.12-14. Traffic impacts are discussed in the Draft EIR in Subsection 5.15.4 on page 5.15-17. The Draft 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. All other impacts were found to be less than significant with mitigation. Although West Basin appreciates the concerns raised, particularly about the 5-year construction timeframe and impacts to quality of life, the comment 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: Environmental Impacts to the El Porto Community*.

## Response to Letter SMI: Smithk601

### **Response SMI-1**

West Basin appreciates the commenter's approval of the website. The commenter is referred to *Master Response: Non-CEQA Issues*.

## Response to Letter SOD: Jane Soderberg

### Response SOD-1

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Cost and Rates*, and *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.



## Response to Letter SPI: Aaron Spiewak

### Response SPI-1

Currently, West Basin recycles approximately 35 million gallons per day (MGD) of secondary effluent from Hyperion that makes up for the total existing customer demand within West Basin's service area. The Draft EIR Subsection 7.2.1 provided an in-depth analysis on West Basin's current planning efforts to increase recycled water. As noted in the analysis, under the current agreement (City of Los Angeles 2018) to upgrade Hyperion, the expansion of West Basin's Recycled Water Program would increase capacity to allow for the recycling of 70 MGD of secondary effluent. However, as explained in Subsection 7.2.1 the expansion of the existing recycled water use in the region will not completely offset the need for imported water. Nor would it eliminate the need for additional water supply diversification afforded by ocean water desalination. See response to comments HTB-37 and LAW2-42.

## Response to Letter STAC: Christy Stanich

### Response STAC-1

The Project proposes to utilize the best available linear diffuser design to minimize the mortality of all forms of marine; see *Master Response: Supplemental Studies* and Final EIR Appendix 14A prepared by Roberts (2019). The impacts of brine discharge have been evaluated in the Draft EIR consistent with the 2015 OPA, and consistent with Roberts, 2018.

The analysis of potential Project-related effects on marine ecosystems included an analysis of potential brine discharge toxicity (Draft EIR pages 5.11-56 through 5.11-58). As presented in the Draft EIR, after reviewing available scientific studies of salinity toxicity on marine taxa, it was determined that the salinity concentrations estimated to occur within the brine mixing zone (BMZ) for the Project did not exceed any documented or known concentrations at which toxic effects on marine taxa or ecosystems would be expected to occur.

See also *Master Response: Water Supply Alternatives*.

## Response to Letter STAJ: Jim Stanich

### Response STAJ-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community*.

### Response STAJ-2

NRG Inc. owns the property on which the proposed Project would be located; West Basin would lease or otherwise acquire the property to be used for the Project. If the South Site is not chosen as the location for the proposed Project, NRG as the property owner, not West Basin, maintains discretion about the end use of the South Site.

### Response STAJ-3

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). West Basin is committed to continued water use efficiency programs and will continue to pursue aggressive conservation as a component of the water supply portfolio. However, the expansion of an existing conservation program does not meet the objective of diversification; it's just more of the same, and puts West Basin at greater risk of relying on customer responses to a rationing program during a drought. See *Master Response: Water Supply Alternatives*

### Response STAJ-4

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 warranted; see *Master Response: Non-CEQA Issues*.

## Response to Letter STAN: Travis Stansbury

### Response STAN-1

The Draft EIR Subsection 7.2.1 considered a range of water supply alternatives including increased conservation, stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse. But the need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in West Basin's 2015 Urban Water Management Plan (UWMP) Table 5-5 and 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 feet by 2020 and 21,500 AF by 2025 and beyond. In other words, the proposed Local Project is sized at 20 million gallons per day (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. See Draft EIR Tables 7-1 and 7-2, and *Master Response: Water Supply Alternatives*.

## Response to Letter STAU: Nic Stauber

### Response STAU-1

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 warranted; see *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter STAV: William Stavropolous

### Response STAV-1

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 warranted; see *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter TEL: Ed Tellis

### Response TEL-1

The Draft EIR Subsection 7.2.1 did indeed evaluate a stormwater capture alternative. As described in detail in Section 7 of the Draft EIR and in *Master Response: Water Supply Alternatives*, stormwater capture is problematic within the West Basin service area since percolation is not effective in conveying stormwater from the surface through the clay layers and into the potable aquifer. Stormwater injection would be required. For stormwater capture to be considered as a new local water supply for West Basin, stormwater runoff would not only have to be captured and stored within the West Coast Groundwater Basin when available, but it would also have to be produced as groundwater by West Basin's customer retail water agencies with groundwater rights. But the need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in West Basin's Urban Water Management Plan (UWMP) Table 5-5 and 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 AF by 2020 and 21,500 AF by 2025 and beyond. In other words, the proposed Local Project is sized at 20 million gallons per day (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. See Draft EIR Subsection 7.2.1, and *Master Response: Water Supply Alternatives*.

## Response to Letter TIS: Ralph Tisdale

### Response TIS-1

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Cost and Rates*, and *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.



## Response to Letter TIS2: Ralph Tisdale

### Response TIS2-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Non-CEQA Issues*.

### Response TIS2-2

See Master Response: *Environmental Impacts to the El Porto Community*. See also response to comment MUP-4 through MUP-6. Operation of the proposed ocean water desalination facility would generate noise from the treatment equipment as well as from increased human activity on the property involved with operating and maintaining the facility. All stationary mechanical equipment (e.g., pumps, generators) would be housed within enclosed structures; therefore, noise generated by ocean water desalination facility operation would be minimal and would not adversely affect nearby sensitive receptors (residential uses located approximately 130 feet south of the ESGS South Site facilities). Major ocean water desalination facility components, such as the reverse osmosis (RO) system, would be fully enclosed in a building and thus would not generate operational noise levels that would expose persons to or generate noise levels in excess of applicable standards.

Operational noise from the desalinated water pump station and discharge pump station would occur approximately 275 feet from the nearest sensitive receptors (residential uses) to the south. At these distances, maximum noise levels from the Local Project discharge pump station (the nearest noise generator to the noise-sensitive receptors) would be approximately 62 dB, assuming no attenuation from enclosures, intervening structures, or topography, which could exceed Manhattan Beach's operational noise standards for residential uses. However, Mitigation Measure NOI-4 would require that West Basin enclose all noise-generating machinery to meet nighttime noise standards for residential uses, which would achieve 40 dBA attenuation. As a result, noise levels at the property line would be reduced to below operational noise standards for residential use.

### Response TIS2-3

The commenter's concern about that the Project-related lane closures during construction would severely increase the delay southbound at the traffic light on 45<sup>th</sup> Street, will be addressed in preparation of the Traffic Control Plan that is required by Mitigation Measure TRA-1. Measures will be implemented as part of the Plan to reduce the potential for the proposed Project's construction-related traffic to result in traffic delays or impacts on existing circulation patterns

and intersection/roadway Level of Service. See also *Master Response: Environmental Impacts to the El Porto Community*.

### **Response TIS2-4**

Air quality impacts are discussed in the Draft EIR in Subsection 5.2.4 beginning on page 5.2-22. Construction impacts are detailed in tables 5.2-9 and 5.2-10. As shown, the Draft EIR concludes that there is potential for significant and unavoidable impacts related to mass air emissions during construction. It is important to note that these conclusions are made based on attainment conditions within the entire South Coast Air Basin and do not necessarily indicate increased impacts adjacent to the proposed Project site. To address localized impacts, the Draft EIR also includes an analysis of air quality impacts to sensitive receptors, which includes residents within the El Porto community just south of the proposed Project site (see Draft EIR starting on page 5.2-45). In order to identify impacts to nearby sensitive receptors, the South Coast Air Quality Management District (SCAQMD) recommends using its Localized Significance Thresholds (LSTs). LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance (SCAQMD 2008c). The LST methodology assists lead agencies in analyzing localized air quality impacts to nearby sensitive receptors, and in this case analyses potential impacts to residences and other sensitive receptors adjacent to the proposed ocean water desalination facility within the El Porto community. As shown in the Draft EIR analysis on pages 5.2-46 through -55, neither construction nor operation would expose sensitive receptors within the El Porto community to substantial air pollutant concentrations, and localized impacts would be less than significant.

### **Response TIS2-5**

The EIR evaluates impacts of the proposed Project at the North Site and South Site, which includes demolition of the ESGS Units 3 and 4 at the North Site (see Draft EIR pages 5.1-11, 5.1-21, and 5.1-23), and a thorough analysis of impacts on surrounding public views at the South Site (see Draft EIR 5.1-12 through 5.1-13; 5.1-16 to 5.1-17; 5.1-22; 5.1-24). The commenter's opinions regarding land use planning and Project location will be forwarded to the decision-makers for their consideration in taking action on the proposed Project. Refer to *Master Response: Non-CEQA Issues*.

## Response to Letter UGA: Gregory Ugarte

### Response UGA-1

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*, *Master Response: Cost and Rates*, *Master Response: Water Supply Alternatives*, and *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter UNG: Joseph Ungoco

### Response UNG-1

Regarding the public noticing process, West Basin complied with the requirements of CEQA as defined in the CEQA Guidelines Section 15087(a)(1-3). Section 15087(a) requires one of three notification methods: 15087(a)(1) publication in a newspaper of general circulation; 15087(a)(2) posting of notice on-site where the project would be implemented; or 15087(a)(3) direct mailing to the owners and occupants of property contiguous to the parcel on which the project would be located. West Basin exceeded the CEQA Guidelines by conducting all three methods of notification.

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

## Response to Letter VAN: Debra Van Neas

### **Response VAN-1**

The commenter is referred to *Master Response: Non-CEQA Issues* and *Master Response: Greenhouse Gas Emissions and Energy*. Regarding alternatives to the proposed Project, the commenter is referred to *Master Response: Water Supply Alternatives*. 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 warranted.

## Response to Letter VIC: Norman Vickers

### **Response VIC-1**

Desalination, specifically reverse osmosis, is a proven, advanced water treatment technology that is in use worldwide, including in San Diego, CA. Prior to introducing desalinated water into the West Basin drinking water conveyance system, West Basin would be required to apply for and receive a Permit to Operate a Public Water System (Health and Safety Code Section 116525) from the California Division of Drinking Water (DDW). See Draft EIR Table 3-11 for all permits and approvals with which West Basin will be required to comply prior to implementation of the proposed Project.

## Response to Letter WAL: Mark Wald

### **Response WAL-1**

The Draft EIR Subsection 7.2.1 considered a range of water supply 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*.

## Response to Letter WEI: Kyle Weinsheim

### Response WEI-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval. The community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities.

See also *Master Response: Non-CEQA Issues*.

### Response WEI-2

The comment expresses concern about odor and noise. Air quality impacts related to odor impacts are discussed in the Draft EIR in Subsection 5.2.4 beginning on page 5.2-55. Noise impacts are discussed in the Draft EIR in Subsection 5.12.4 on page 5.12-14. The Draft EIR concludes that there is potential for significant and unavoidable impacts related to increased noise during pile driving associated with construction activities. Odor impacts were found to be less than significant without mitigation. The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*: The North Site and South Site, which would both be located at NRG's facility in El Segundo. The North Site was evaluated as a part of the analysis in equal detail to the South Site. As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide if either site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.



## Response to Letter WEN: Laura Wenglikowski

### **Response WEN-1**

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 warranted; see *Master Response: Non-CEQA Issues*.

## Response to Letter WIC: Kelly Wickemeyer

### Response WIC-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). The community of El Porto has been in the shadow of the NRG facility for years. Locating a light industrial facility in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property values in the adjacent communities. As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Water Supply Alternatives*.

## Response to Letter WILC: John Wilcox

### Response WILC-1

Regarding the comment's statement about the cost and energy intensiveness of desalination, see *Master Response: Greenhouse Gas Emissions and Energy Use* and *Master Response: Cost and Rates*.

### Response WILC-2

See *Master Response: Environmental Impacts to the El Porto Community*. See also response to comment MUP-4 through MUP-6. Operation of the desalination facility would generate noise from the treatment equipment as well as from increased human activity on the property involved with operating and maintaining the facility. However, all stationary mechanical equipment (e.g., pumps, generators) would be housed within enclosed structures; therefore, noise generated by ocean water desalination facility operation would be minimal and would not adversely affect nearby sensitive receptors (residential uses located approximately 130 feet south of the ESGS South Site facilities). Major ocean water desalination facility components, such as the reverse osmosis (RO) system, would be fully enclosed in a building and thus would not generate operational noise levels that would expose persons to or generate noise levels in excess of applicable standards.

### Response WILC-3

Table 7-2 is a summary of the results of the screening of alternatives that is presented in the Draft EIR Subsection 7.2.1; specifically, see pages 7-6 through 7-30 for further explanation. The Draft EIR Subsection 7.2.1 considered a range of water supply alternatives including increased conservation, stormwater capture, increased non-potable recycling, indirect potable reuse, and direct potable reuse. See also Draft EIR Tables 7-1, response to comment CULV-9, PHI-18 and *Master Response: Water Supply Alternatives*.

While maximizing the use of existing sources may reduce some of the need for imported water in the future, current water supply sources do not holistically improve water security, or alleviate the susceptibility of imported water availability during drought conditions, and would not collectively eliminate the need for imported water. 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.

West Basin acknowledges the commenter's position to the proposed Project, and the referenced articles, both of which pre-date the release of the Draft EIR. A more recent March 2019 publication titled, "Coordinated Strategic Plan to Advance Desalination for Enhanced Water Security" (National Science and Technology Council 2019), notes that "Desalination is an important part of a comprehensive approach to improve water availability, resiliency, and security in the U.S."

## **Response WILC-4**

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 also *Master Response: Non-CEQA Issues* and *Master Response: Cost and Rates*.

## Response to Letter WIL: Tom Williams

### Response WIL-1

The cost of a project is not considered an environmental impact under CEQA unless it results in physical changes to the environment. Since the cost of the proposed Project will not in itself result in physical changes, the proposed Project's effect on customer rates is not required to be considered in the Draft EIR. However, West Basin recognizes the importance of having a thorough understanding of the costs and benefits of proposed Project implementation and initiated a rate impact analysis in 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 proposed Project implementation, and 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. See *Master Response: Cost and Rates*.

## Response to Letter WIL2: Tom Williams

### Response WIL2-1

While West Basin acknowledges the commenter's relevant work history, the comment does not identify any specific inadequacies in the Draft EIR analysis. As such, this comment is noted for the record and no further response is warranted. Please also see *Master Response: Environmental Justice* (see also Final EIR Section 18).

### Response WIL2-2

As stated on West Basin's website (<http://westbasindesal.com/draft-eir.html>), "the key documents referenced in the Draft EIR which support the analyses are included in the Appendices. West Basin has also posted its planning and research studies (including the Ocean Water Desalination Program Master Plan) on its website at <http://westbasindesal.org/research-and-planning.html>. Other referenced documents cited and listed in each section on the Draft EIR may be accessed in-person at West Basin's headquarters" in Carson.

The comment states that the Draft EIR should be recirculated. Per CEQA Guidelines Section 15088.5, "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponents have declined to implement." Furthermore, "Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." The questions raised by the comment, 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 on the Draft EIR is not required.

## Response to Letter WIL3: Tom Williams

### Response WIL3-1

As stated on West Basin’s website (<http://westbasindesal.com/draft-eir.html>), “the key documents referenced in the Draft EIR which support the analyses are included in the Appendices. West Basin has also posted its planning and research studies (including the Ocean Water Desalination Program Master Plan) on its website at <http://westbasindesal.org/research-and-planning.html>. Other referenced documents cited and listed in each section on the Draft EIR may be accessed in-person at West Basin’s headquarters” in Carson.

## Response to Letter WIL4: Tom Williams

### **Response WIL4-1**

The Draft EIR includes setting information for all environmental topics analyzed in Section 5, *Environmental Analysis*. The commenter is referred to *Master Response: Environmental Justice* (see also Final EIR Section 18) for impacts to communities in the area in which proposed Project facilities would be implemented.



## Response to WIL5: Tom Williams

### Response WIL5-1

While West Basin appreciates the comment, it does not identify any specific 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 warranted.

The comment states that the Draft EIR should be recirculated. Per CEQA Guidelines Section 15088.5, “New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project’s proponents have declined to implement.” Furthermore, “Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” In response to comments, some changes have been made to the EIR. 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 that West Basin refuses to implement. 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 WIL5-2

The Draft EIR Subsection 7.2.1 evaluates a range of water supply alternatives, including recycling, and explains that expanding the existing recycled water use in the region will not completely offset the need for imported water. Even expanding the recycled water production at the Hyperion Water Reclamation Plant to its full capacity 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.

Indirect Potable Reuse (IPR) would treat wastewater from local wastewater treatment plants (such as the Hyperion Water Reclamation Plant) for injection into the West Coast Groundwater Basin. Once injected, overlying pumpers with storage and extraction rights would benefit from the new water supply resulting in greater conjunctive management of the Basin. Currently the City of Los Angeles is evaluating opportunities to develop an IPR project including developing an appropriate treatment technology, identifying an advanced water treatment plant location, and assessing storage and extraction well field opportunities. IPR continues to represent a drought-resilient source of groundwater replenishment that will replace and reduce imported water demands in the region as groundwater production from the Basin increases. However, West Basin is not the sole provider of IPR in the region, does not have access to adequate source water for the production of IPR in sufficient quantities, does not own groundwater rights that could augment the District’s water supplies through IPR, and would require agreements with overlying pumpers and changes in basin operations that are well beyond West Basin’s ability to implement on its own. As such, the alternative would not augment West Basin water supplies or obviate the need

for water supply portfolio diversity provided by the proposed Project. See also *Master Response: Water Supply Alternatives*.

### **Response WIL5-3**

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. 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 Project component (Ocean Water Desalination Facility, Screened Ocean Intake and Concentrate Discharge, Desalinated Water Conveyance Components).

### **Response WIL5-4**

The purpose of an EIR is to identify the significant effects of a project on the environment (CEQA Guidelines Section 21002.1(a)) and the discussion in the EIR should focus on those potential effects of a proposed project which the lead agency has determined are, or may be, significant (CEQA Guidelines Section 21002.1(c)). The piped water would meet strict SWRCB Division of Drinking Water (DDW) water quality requirements, it would not have a significant effect on the environment and no change to the Draft EIR is required. See *Master Response: Environmental Justice* (see also Final EIR Section 18).

### **Response WIL5-5**

The commenter is referred to *Master Response: Environmental Justice* (see also Final EIR Section 18).

### **Response WIL5-6**

As stated on West Basin’s website (<http://westbasindesal.com/draft-eir.html>), “the key documents referenced in the Draft EIR which support the analyses are included in the Appendices. West Basin has also posted its planning and research studies (including the Ocean Water Desalination Program Master Plan) on its website at <http://westbasindesal.org/research-and-planning.html>. Other referenced documents cited and listed in each section on the Draft EIR may be accessed in-person at West Basin’s headquarters” in Carson.

Draft EIR Section 5.4 addresses Cultural Resources and is supported by Draft EIR Appendix 7A (Cultural Resources Assessment) which describes the cultural setting, the research design and research methods. Draft EIR Subsection 5.8.4 addresses hazards and hazardous materials.

### **Response WIL5-7**

The geoarchaeological review included on page 5.4-24 of the Draft EIR provides a discussion of sea-level change from the Late Pleistocene to Early Holocene. The discussion states that the proposed offshore component location would have been located on dry land and has the potential to contain archaeological resources dating from 12,000 years ago, when Native Americans entered the region, to 4,000 years ago, when sea-level stabilized at its current level.

### **Response WIL5-8**

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 *Master Response: Water Supply Alternatives*.

### **Response WIL5-9**

As explained in the Draft EIR Section 2.10, West Basin is a regional water wholesaler, and sells water to its customers, the local retailers, who in turn sell water to customers through local distribution systems that currently manage, and will continue to manage, diurnal demands.

### **Response WIL5-10**

The commenter is referred to *Master Response: Environmental Justice* (see also Final EIR Section 18).

### **Response WIL5-11**

Regarding the comment's question about growth inducement and "more reliable/lower costs for whom," the Draft EIR text on page 3-3 under the Section 3.3, *Project Objectives*, states that the beneficiaries of reliable water are West Basin customers: "West Basin's goal 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, consistent with goals for desalinated ocean water supplies identified in West Basin's 2015 Urban Water Management Plan. The need for water supply reliability has been highlighted by increased frequency and prolonged duration of recent droughts and decreasing reliability of imported water supplies." Regarding costs, see *Master Response: Cost and Rates*.

### **Response WIL5-12**

See response to comment WIL-1.

### **Response WIL5-13**

As discussed extensively in the Draft EIR Section 5.11, *Marine Biological Resources*, the greatest potential for direct and indirect effects of the proposed Project during construction and operation is on macrobiota. The reason that microbiota such as holoplankton (those that spend their entire life cycles as plankton) are not emphasized, as outlined in the original 316(b) guidance (EPA 1977), is that: 1) holoplankton have very short generation times, on the order of hours to a few days for phytoplankton and a few days to weeks for zooplankton; 2) they have the capability to reproduce continually (asexually in the case for phytoplankton); and 3) many of the most abundant phytoplankton and zooplankton species along the coast of California have populations that span the entire Pacific and in some cases all of the world's oceans. In contrast, meroplankton, including invertebrate and fish larvae, have: 1) much shorter spawning seasons, in some cases a single month; 2) their distributions are restricted to the narrow shelf along the coast and have specific habitat requirements which further restricts their distribution, and; 3) entrainment of larvae has a greater likelihood of negatively impacting the adult populations. Consequently, this Draft EIR focuses on meroplankton when assessing proposed Project impacts.

## Response WIL5-14

The *Identification of Resources Within Project Site* Subsection in the Draft EIR beginning on page 5.4-19 provides a summary of the identification efforts for historic architectural resources as well as archeological resources for both onshore and offshore components.

## Response WIL5-15

The comment regarding historical aerial photographs does not identify a specific concern and does not comment on the adequacy of the Draft EIR. Without a stated specific concern, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

The comment regarding Chevron marine and offshore spills presumably refers to offshore spills attributed to Chevron offshore operations. The comment does not explain how offshore spills by Chevron or any other company would have any effect on or from the proposed Project. Note that oil spilled in the ocean floats on the top of the ocean surface, whereas the proposed Project's source water would be from the inflow pipe on the ocean floor. Thus, there would likely be minimal interaction between future oil spills and the proposed Project.

This comment regarding "natural offshore oil seeps = Brea = faults to surface" is indistinct but appears to express concern regarding active faults and natural oil seeps relative to the proposed Project. With regard to offshore faults and any work on the ocean floor, as discussed in the Draft EIR, Section 5.6, *Geology, Soils, and Seismicity*, page 5.6-11, the proposed Project components are not located on any active fault.

## Response WIL5-16

This comment does not provide a specific concern regarding the basin or the adequacy of the Draft EIR. Without a specific concern, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

## Response WIL5-17

The comment expresses concern about "water quality – Chevron oil spill." 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.

## Response WIL5-18

As discussed in the Draft EIR, Section 5.6, *Geology, Soils, and Seismicity*, page 5.6-11, the proposed Project components would not be located on any active fault.

With regard to the use of "SCEqCntr" data, it is assumed that the comment is referring to the Southern California Earthquake Data Center (SCEDC). Data available from the SCEDC is used in Draft EIR Section 5.6, *Geology, Soils, and Seismicity*, on page 5.6-10 (SCEDC is a part of the Working Group on California Earthquake Probabilities), and page 5.6-11, where their data on the Palos Verdes Fault Zone is used.

With regard to seismicity resulting in seiches or tsunamis, the effects and associated 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 potentially significant impacts under CEQA. Also note that seiches are damaging waves that occur within closed water bodies, a condition not present here.

### **Response WIL5-19**

West Basin acknowledges the commenter's credentials and relevant work history.

### **Response WIL5-20**

The language included in the Notice of Availability is appropriate for the current stage of the proposed Project. The conditional tense is used throughout the EIR to describe what might result if (conditioned on) the proposed Project were to be approved and permitted to operate. If and when West Basin's Board of Directors certifies the EIR and considers Project approval, more definitive statements about the Project would be able to be made.

### **Response WIL5-21**

As explained in the Draft EIR Section 5, *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 Draft EIR Section 5 distinguishes between impacts resulting from each the Local Project and the Regional Project. The assessment of impacts resulting from the Regional Project are assessed in terms of the incremental increase potentially resulting from the additional build out and operation, in addition to impacts described for the Local Project facilities. If substantial changes are proposed to the Project Description in the future, or substantial changes in circumstance under which the Project is being undertaken occur following certification of this Final EIR, or if new information which was not known at the time the EIR is certified becomes available, a subsequent or supplemental environmental review would be required (CEQA Guidelines Section 21166). But there is no reason or requirement to revise this EIR to be entirely programmatic, since project-level details are known at this time.

### **Response WIL5-22**

Million gallons per day (MGD) is a flow rate, and acre-feet per year (AFY) is a unit of volume. They are used differently throughout the Draft EIR on purpose. No changes have been made to the Draft EIR in response to this comment.

### **Response WIL5-23**

The Draft EIR Section 5.16, *Utilities and System Systems*, Subsection 5.16.2 describes the available service area water supplies and describes the 64,468 afy of adjudicated groundwater water rights, and recycled water.

### **Response WIL5-24**

As explained in Draft EIR Section 1.1, the Local Project would provide approximately 10 percent of West Basin’s water demand, relieving pressure on the heavily constrained supply of imported water available to West Basin. The Local Project would be used to serve communities within West Basin’s service area. The Regional Project would be initiated by West Basin in partnership with other local and regional partners, such as Metropolitan Water District of Southern California (MWD), to meet the demands and increase water supply reliability for a larger portion of the Southern California community.

### **Response WIL5-25**

The Local Project components are described in the Draft EIR Subsection 3.4.1 the Local Project construction is described in the Draft EIR Section 3.5. The Regional Project components are described in the Draft EIR Subsection 3.4.2 and the Regional Project construction is described in Draft EIR Section 3.6. See also response to comment WIL5-3.

### **Response WIL5-26**

See response to comment LARWQCB-22.

### **Response WIL5-27**

See response to comment WIL5-4. This comment requests information that is not relevant to the Draft EIR analysis. No response is warranted.

### **Response WIL5-28**

The EIR Section 3.1, *Project Overview* (see Final EIR Section 11) explains that a desalinated water conveyance system would be constructed to deliver water produced at the new desalination facility to the local and regional water supply systems. The EIR Section 3.2, *Project Location* (see Final EIR Section 11) explains “***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” (emphasis added<sup>8</sup>). Proposed distribution pipeline alignments and pump station locations are shown in EIR Figure 3-5.

### **Response WIL5-29**

The definition of “appurtenant” can be found in any online dictionary (<https://www.merriam-webster.com/dictionary/dictionary>).

### **Response WIL5-30**

The references cited by the comment, although interesting in an historic sense and representative of what taxa occupied specific intertidal and pelagic environments mid-20th Century, provides little to no added support to the assessment of potential effects of the proposed Project on the

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<sup>8</sup> The new (underlined) text was added in response to comment MWD-1.

species that occupy those ecological niches under existing conditions. The proposed Project assessment assumed that all microbiota would be potentially impacted by either the Project's ocean water intake or its effluent discharge. Having an extensive taxonomic species list would not change that assessment. See response to comment WIL5-13.

### **Response WIL5-31**

Regarding populations analyzed related to environmental justice, the commenter is referred to *Master Response: Environmental Justice* (see also Final EIR Section 18).

### **Response WIL5-32**

See the Draft EIR Section 2.2, *Project-Level and Program-Level Analysis in This Draft EIR*, and Section 5, Subsection *Approach to Analysis*. This comment requests definitions of words out-of-context that are not relevant to the Draft EIR analysis.

### **Response WIL5-33**

As explained in the Draft EIR Section 5, *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 Project that are not well-defined (such as regional partners). Every topical section in Draft EIR Section 5 distinguishes between impacts resulting from each of the two Projects. The assessment of impacts resulting from the Regional Project is assessed in terms of the incremental increase potentially resulting from the additional build out and operation of the described Local Project facilities.

### **Response WIL5-34**

The baseline conditions against which the potential direct and indirect impacts of the proposed 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 Description, or substantial changes in circumstance under which the proposed Project is being undertaken occur following certification of this Final EIR, or if new information which was not known at the time the EIR was certified becomes available, a subsequent or supplemental environmental review would be required (CEQA Guidelines Section 21166). But there is no reason or requirement to revise this EIR to be entirely programmatic, since project-level details are known at this time.

### **WIL5-35**

The Draft EIR Figure 3-1 is a Vicinity Map and shows the proposed Project location relative to the Los Angeles International Airport (LAX). The Draft EIR explains on Sections 3.2. *Project Location* and 5.3.2 *Environmental Setting* that the desalination facility site is approximately 2.5 miles southwest of LAX.

**Response WIL5-36**

This comment requests definitions of words out-of-context that are not relevant to the Draft EIR analysis.

**Response WIL5-37**

This comment requests definitions of words out-of-context that are not relevant to the Draft EIR analysis.

**Response WIL5-38**

As described in Draft EIR Section 3.3, *Project Objectives*, West Basin’s goal 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. As noted in response to comment WIL5-4, the purpose of an EIR is to identify the significant effects of a project on the environment (CEQA Guidelines Section 21002.1(a)) and the discussion in the EIR should focus on those potential effects of a proposed project which the lead agency has determined are, or may be, significant (CEQA Guidelines Section 21002.1(c)). Draft EIR Section 5.11.3 therefore, considers the proposed Project’s potentially significant impacts on Marine Biological Resources, and describes the significance thresholds and criteria that are utilized in the analysis.

**Response WIL5-39**

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.

See also response to comment WIL-1.

**Response WIL5-40**

See *Master Response: Cost and Rates*.

**Response WIL5-41**

While West Basin appreciates the comment, it requests information that is not relevant to the Draft EIR and does not specify any deficiencies in the analysis. As a result, this comment has been noted for the record and no further response is necessary.

**Response WIL5-42**

While West Basin appreciates the comment, it requests information that is not relevant to the Draft EIR and does not specify any deficiencies in the analysis. As a result, this comment has been noted for the record and no further response is necessary.



### Response WIL5-43

The definitions of “reasonable” and “determined” are not intended to be technical and can be found in any online dictionary (<https://www.merriam-webster.com/dictionary/dictionary>).

West Basin recognizes the importance of having a thorough understanding of the costs and benefits of proposed Project implementation and initiated a rate impact analysis in 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 proposed Project implementation, and 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. See also *Master Response: Cost and Rates*.

### Response WIL5-44

See response to comment WIL5-39.

### Response WIL5-45

See response to comment WIL5-43, and *Master Response: Cost and Rates*.

### Response WIL5-46

See response to comment WIL5-13. Draft EIR Subsection 5.11.4 discusses if, and to what degree, the proposed Project could have an adverse impact on marine biological resources. The Draft EIR Table 5.11-9 presents the area of production foregone<sup>9</sup> (APF) estimates associated with the screened ocean intake, and Table 5.11-12 presents the APF estimates resulting from turbulent discharge associated mortality.

### Response WIL5-47

The Draft EIR used common terms, and their definitions can be found in a dictionary (e.g., at <https://www.dictionary.com/>).

### Response WIL5-48

This comment requests definitions of words out-of-context that are not relevant to the Draft EIR analysis.

### Response WIL5-49

Additional setting information relating to local groundwater conditions is not required to adequately support the assessment of impacts presented in Draft EIR Subsection 5.9.4. As described 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). As such, dewatering

<sup>9</sup> The potential impact that entrainment of larval fish and invertebrate taxa could have on the marine ecosystem in terms of loss of energy transfer from one trophic level to another, and overall loss of productivity of the Project marine study area, is referred to as the area of production foregone (APF).

activities conducted during construction would not result in significant long-term effects to local groundwater supplies.

### **Response WIL5-50**

As explained in the Draft EIR Section 2.10, West Basin was formed in 1947 as an imported water wholesaler for the southwestern portion of Los Angeles County. West Basin's 185-square-mile service area is composed of 17 cities and several unincorporated areas. As a regional water wholesaler, West Basin purchases water from the MWD as one of its 26 member agencies. West Basin then sells water to its customers, the local retailers, who in turn sell water to its customers through local distribution systems that currently manage diurnal demands. The local systems will continue to operate as they have; only the West Basin portfolio would be different.

### **Response WIL5-51**

As noted in Draft EIR Subsection 7.2.1, the direct introduction of advanced treated recycled water into the treated drinking water distribution system to produce a Direct Potable Reuse (DPR) supply faces the greatest challenges in regulation development, technology development, and public health safeguards. The implementation of the proposed Project would allow West Basin to position itself to consider DPR through raw water augmentation when such regulations are in place. The absence of the proposed Project (the No Project Alternative) makes this alternative infeasible and too speculative for obtaining the goal of 21,500 AFY of potable drinking water.

### **Response WIL5-52**

See response to comment WIL5-50.

### **Response WIL5-53**

The comment expresses concern about MWD's IRP and WaterFix. 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.

### **Response WIL5-54**

See response to comment WIL5-49.

### **Response WIL5-55**

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.

### **Response WIL5-56**

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.

## Response WIL5-57

CEQA Guidelines Section 21082.2 explains that “economic impacts which do not contribute to, or are not caused by, physical impacts on the environment” are not to be considered substantial evidence and do not need to be addressed in an EIR. Please see *Master Response: Cost and Rates* and *Master Response: Non-CEQA Issues*.

## Response WIL5-58

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.

## Response WIL5-59

The text referred to in the Draft EIR on page 2-8 clearly states that the volumes are for 2014, and not an annual rate that would apply to multiple years. In addition, the comment requests definitions to distinguish certain common water supply terms (e.g., recharge versus replenishment, extract versus produce), none of which addresses the adequacy of the Draft EIR. No edits were made in response to this comment.

## Response WIL5-60

This comment requests definitions of words out-of-context and descriptions that are not relevant to the Draft EIR analysis.

## Response WIL5-61

The language cited (“Protect and restore important ecosystems”) from Section 2.3, *Introduction*, is language from the 2014 California Water Action Plan (revised in 2016). Draft EIR Subsection 2.3.2 intends to describe applicable plans that the proposed Project demonstrates compliance with related to desalination, which is a key component of a reliable diverse water supply portfolio, and incorporated into numerous state and local planning efforts.

## Response WIL5-62

The language cited in this comment is from Draft EIR Section 2; specifically, Subsection 2.3.1, *Imported and Local Water Supplies*. The discussion is addressing groundwater supplies and, in context, attempts to explain “[T]he groundwater extraction in the West Coast Groundwater Basin has been in decline since 2011, with the extracted volume recorded in Fiscal Year 2015-16 of approximately 31,600 AFY (WRD, 2017). The drivers for declining utilization of the adjudicated extraction rights are manifold. Historical contamination from leaky underground storage tanks and seawater intrusion have made it challenging to find groundwater of high quality within the WCGB. *Additionally, surging real estate prices and competition for land have made acquiring suitable sites that can produce high quality of groundwater with minimum treatment costly. If treatment is needed, high land costs compounded with high treatment costs further discourage retailers and other groundwater right holders to use such a resource when more economical imported water is readily available.*” [emphasis added]

This comment requests definitions of words out-of-context, and for information that are not relevant to the Draft EIR analysis. No response is warranted. See also *Master Response: Cost and Rates*.

### **Response WIL5-63**

The language cited in this comment is from Draft EIR Section 2; specifically, Section 2.3.1; *Imported and Local Water Supplies*. The discussion is addressing recycled water supply, and the cited text explains, “[A]ny further investigations beyond the pilot project *would* require subsequent interagency agreements . . . (emphasis added)” if additional investigations were pursued. No additional investigations have been pursued and therefore, there are no drafts for administrative, costs, and financing arrangements, costs, and financing.

### **Response WIL5-64**

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.

### **Response WIL5-65**

See response to comment WIL5-22. 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.

### **Response WIL5-66**

See response to comment WIL5-22.

### **Response WIL5-67**

The comment provides information regarding census tracts receiving identical quality/pressures/flows while paying the same rates and surcharges in the West Basin service area, however this information does not appear to identify any specific inadequacies in the Draft EIR analysis. As such, this comment has been noted for the record and no further response is warranted. Please also see *Master Response: Environmental Justice* (see also Final EIR Section 18).

### **Response WIL5-68**

See response to comment WIL5-47.

### **Response WIL5-69**

See response to comment WIL5-13. The comment’s request to revise all reference related to ecosystem, biology, and “outfall” is unclear and not specific. This comment does not address 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.

## Response WIL5-70

As part of the Project planning efforts, West Basin prepared preliminary cost estimates for the proposed Project that are included in the Ocean Water Desalination Program Master Plan prepared in 2013. This cost estimate is available on the District's website:

[http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan\\_PMP%20Vol%20I%20\(2013\).pdf](http://westbasindesal.com/assets/Documents%20and%20Files/Research%20Documents/Ocean%20Water%20Desalination%20Program%20Master%20Plan_PMP%20Vol%20I%20(2013).pdf)

These preliminary cost estimates provide a planning-level range of total Project costs that include costs for constructing the treatment facility (including the offshore intake and discharge modifications) and the product water distribution system as well as annual operations and maintenance costs. These preliminary estimates provide a sense for the ultimate scale of the costs, but present a wide range to account for uncertainty. As the Project design is refined, including permitting and mitigation commitments, actual Project costs will also become more refined.

West Basin has not finalized its funding portfolio for the Project, but numerous financing methods are available that may include any combination of public-private partnerships (P3), low-interest loans, grant funding, and traditional financing through bonds or capital loans. West Basin anticipates developing the most cost effective approach available. However, the cost of a project is not considered an environmental impact under CEQA unless it results in physical changes to the environment. Because the cost of the Project will not in itself result in physical changes, the Project's effect on customer rates is not considered an environmental impact. But, West Basin recognizes the importance of having a thorough understanding of 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 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. Impacts on rates will depend in part on the financing approach, discussed above. Please also see *Master Response: Cost and Rates*.

## Response WIL5-71

The commenter is referred to Draft EIR Appendix 2A, Feasibility Assessment of Subsurface Seawater Intakes Proposed Desalination Facility El Segundo California, and Appendix 2B, Seabed Infiltration Gallery Construction and Life-Cycle Costs for the extensive evaluations undertaken by West Basin regarding subsurface intakes. Also refer to *Master Response: Supplemental Studies*. The Supplemental Subsurface Feasibility Study which is provided as Final EIR Appendix 13, explains the feasibility of the SSI technologies depends on a variety of site-specific criteria listed in the Ocean Plan (2015) and presents discussions on hydrogeological constraints, oceanographic constraints, geochemical and water quality constraints, land use and sensitive habitats, maintenance, and other technical and economic risk factors for each type of subsurface intake.

Regarding any impacts to cost within West Basin’s service area, see *Master Response: Cost and Rates*. See also *Master Response: Environmental Justice* (see also Final EIR Section 18); however, it is not evident from the comment how subsurface intakes associated with the proposed Project could impact environmental justice.

### **Response WIL5-72**

See *Master Response: Cost and Rates*.

### **Response WIL5-73**

The commenter is referred to Draft EIR Appendix 2B, Seabed Infiltration Gallery Construction and Life-Cycle Costs, for more discussion of the topic. The Draft EIR used common terms, and their definitions can be easily found in a dictionary, available at: <https://www.dictionary.com/>).

### **Response WIL5-74**

The comment does not specify any deficiencies in the Draft EIR analysis. Some of the references in the EIR include publication dates, and others, like websites, do not. No further response is warranted.

### **Response WIL5-75**

Refer to response to comment WIL5-6.

### **Response WIL5-76**

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. For water cost see *Master Response: Cost and Rates*.

### **Response WIL5-77**

The comment’s request for a model that covers “entire existing distribution system and their peak/normal/low flow and pressure and flow rates” is not relevant to the analysis included in the Draft EIR. If and when the Local Project and/or Regional Project is approved and built, West Basin will ensure pipelines are sized appropriately to connect with MWD’s existing infrastructure.

### **Response WIL5-78**

The comment states “TBR” and is found elsewhere in the comment letter to mean: “TBR = To Be Revised/Updated by 06/30/18.” This comment is unclear and does not speak to the adequacy of the Draft EIR and no further response is warranted.

### **Response WIL5-79**

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.

## **Response WIL5-80**

*See Master Response: Cost and Rates.*

## **Response WIL5-81**

The comment states “TBR” and is found elsewhere in the comment letter to mean: “TBR = To Be Revised/Updated by 06/30/18.” This comment is unclear and does not speak to the adequacy of the Draft EIR and no further response is warranted.

## **Response WIL5-82**

Please refer to Draft EIR Section 2.9 for more information about the CEQA-Plus requirements and how they were addressed in the Draft EIR. Impact BIO 5.3-1, which begins on page 5.3-31, discusses the proposed Project’s potential to adversely affect species protected under the Federal Endangered Species Act.

## **Response WIL5-83**

CEQA-Plus requirements for the State Revolving Fund program for low interest loans to public agencies are discussed and defined in the Draft EIR Section 2.9, starting on page 2-23. References for the CEQA-Plus-specific analyses associated with Air Quality, Biological Resources, Cultural Resources, and Environmental Justice, are incorporated into the appropriate Reference Subsections on the Draft EIR; see Subsection 5.2.7, Subsection 5.3.7, Subsection 5.4.7, and Section 6.4, respectively.

## **Response WIL5-84**

The comment states “TBR” and is found elsewhere in the comment letter to mean: “TBR = To Be Revised/Updated by 06/30/18.” This comment is unclear and does not speak to the adequacy of the Draft EIR and no further response is warranted.

## **Response WIL5-85**

The geoarchaeological review in the Draft EIR on page 5.4-24 includes the offshore component and concludes that offshore construction has the potential to encounter submerged archaeological resources. Draft EIR Appendix 7B references past borings: “Marine borings near the coastal margin near the ESGS Facility have been interpreted as “Recent and Upper Pleistocene” (Holocene and Late Pleistocene) dune sands (California State Lands Commission, 2016).”

Historical aerial imagery can be found at [historicaerals.com](http://historicaerals.com) as well as FrameFinder ([http://mil.library.ucsb.edu/ap\\_indexes/FrameFinder/](http://mil.library.ucsb.edu/ap_indexes/FrameFinder/)).

## **Response WIL5-86**

The Wilmington Generating Station is discussed in the Draft EIR on pages 5.4-16 and -18 as part of the historical context for electricity generation in Los Angeles because it was the first generating station in Los Angeles which allowed for growth of the city. The discussion provides background for assessing the significance of the El Segundo Generating Station which is located within the proposed Project area.

Historical aerial imagery can be found at [historicalairals.com](http://historicalairals.com) as well as FrameFinder ([http://mil.library.ucsb.edu/ap\\_indexes/FrameFinder/](http://mil.library.ucsb.edu/ap_indexes/FrameFinder/)).

### **Response WIL5-87**

The conclusions in the paragraph cited by the comment come directly from the Draft EIR Appendix 7B, West Basin Municipal Water District Ocean Water Desalination EIR – Geoarchaeological Review. Further, the information provided in the Draft EIR is consistent with the findings included in Appendix 7B. Appendix 7B states: “The offshore portion of the ocean water intake system which includes the construction of a screened intake facility located 2,500 feet west of the proposed desalination facility is underlain by Pleistocene sedimentary deposits (Qps). Marine borings near the coastal margin near the ESGS Facility have been interpreted as “Recent and Upper Pleistocene” (Holocene and Late Pleistocene) dune sands (California State Lands Commission, 2016). Since current sea level was established approximately 4,000 years ago, the offshore portion appears to have the potential to contain cultural remains dating between approximately 12,000 and 4,000 years ago.” The Draft EIR on page 5.4-30 states that “the sediments underlying the screened ocean intake and discharge area have the potential to contain buried archaeological deposits that may qualify as historical resources under CEQA.” And as such, “construction of the Local Project ocean intake and concentrate discharge structures has the potential to encounter subsurface archaeological deposits that qualify as historical resources under CEQA, and may result in a significant impact. Implementation of Mitigation Measures CUL-1 through CUL-5 would be required to ensure that the proposed Project’s potential impacts to archaeological resources that may qualify as historical resources are less than significant.”

The comment states that the Draft EIR should be recirculated. Per CEQA Guidelines Section 15088.5, “New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project’s proponents have declined to implement.” Furthermore, “Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” In response to comments, some changes have been made to the EIR. 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. 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 WIL5-88**

The geoarchaeological review in the Draft EIR on page 5.4-24 includes the offshore component and concludes that offshore construction has the potential to encounter submerged archaeological resources. Mitigation Measure CUL-3 (page 5.4-33) has been revised to include monitoring methodology for offshore components, which includes the inspection of a 5 percent sample of sediments produced during dredging. See response to comment SLC-14.



## Response WIL5-89

Refer to response to comment WIL5-6 and WIL5-74.

## Response WIL5-90

The comment states “TBR” and is found elsewhere in the comment letter to mean: “TBR = To Be Revised/Updated by 06/30/18.” This comment is unclear and does not speak to the adequacy of the Draft EIR and no further response is warranted.

## Response WIL5-91

The terms used in Subsection 5.5.4, on pages 5.5-10 and 5.5-11 provide qualified perspectives on the future of renewable energy. The statement that there is a financial incentive to avoid waste is supported by common logic as is the view that green building practices will save energy costs in the future.

## Response WIL5-92

The discussion of the 2017 Scoping Plan Update referenced by the comment occurs in the impact analysis for ENERGY 5.5-1 regarding whether the Project would conflict with adopted energy conservation plans. The Draft EIR identifies that no local or regional energy conservation plans are directly applicable to the Project, but does identify the 2017 Scoping Plan Update as having applicable high-level objectives and goals intended to reduce energy demand within the state’s water sector in the context of developing “more reliable water supplies for people, agriculture, and the environment, provided by a more resilient, diversified, sustainably managed water resources system.”

With no adopted local or regional energy conservation plans to analyze, the impact analysis for ENERGY 5.5-1 can only rely on relevant adopted state and federal plans, if they exist. Though the 2017 Scoping Plan Update is not an energy conservation plan per se, it includes energy conservation goals and policies that apply generally to the proposed Project, and it is relevant to the impact analysis on page 5.5-15 because it acknowledges that water supply reliability may have to take precedence over achieving GHG emission reductions from water sector activities where a potential conflict exists.

The local climate action plans for LA County and El Segundo include measures for water conservation that are intended to reduce the energy use and GHG emissions associated with the conveyance and consumption of potable water. The 2015 El Segundo Energy Efficiency and Climate Action Plan (EECAP) indicates that community-wide GHG emissions associated with the conveyance and consumption of water constitute less than 0.005 percent of the city’s total emissions in 2012. Nonetheless, the EECAP includes a community measure to promote water efficiency actions to enable exceedance of the SB X7-7 standard (reduce water consumption 20 percent by 2020), and municipal measures to implement a water leak detection program and to upgrade or incorporate water-conserving landscapes. Similarly, the 2020 Los Angeles County Climate Action Plan (CAP) includes a measure to reduce per-capita water use, consistent with SB X7-7, through strategies that the County, in conjunction with local urban water agencies, will implement to promote water conservation throughout the unincorporated areas.

The Project proposes to replace imported MWD water with desalinated water. Notwithstanding the fact that the energy used to deliver the City of El Segundo's water supply is a very small contributor to the city's overall GHG emissions, the proposed Project's increased energy use over imported water should not prevent the City of El Segundo from achieving the goals of its EECAP because the Project is net carbon neutral with respect to GHG emissions. The relatively high cost and energy footprint of desalinated water should provide additional incentives for conservation, and thus the Project should not conflict with the water conservation goals of both the El Segundo EECAP and the Los Angeles County CAP.

### **Response WIL5-93**

See response to comment WIL5-92.

### **Response WIL5-94**

See response to comment WIL5-92.

### **Response WIL5-95**

Other than improving the reliability of water supply to those service areas, the proposed Project would not result in changes to or impacts on those service areas and their existing distribution networks. Figure 3-5 provides an overview of pipeline routes needed to connect the desalination facility with the regional water supply network. CEQA does not require the presentation of information that has no bearing on analyzing the proposed Project. No edits were made in response to this comment.

### **Response WIL5-96**

As explained in the response to comment WIL5-18, Southern California Earthquake Data Center (SCEDC) information was presented in the Draft EIR Section 5.6, *Geology, Soils, and Seismicity*, on page 5.6-10 (SCEDC is a part of the Working Group on California Earthquake Probabilities), and page 5.6-11, where their data on the Palos Verdes Fault Zone is used.

### **Response WIL5-97**

This comment does not define the term "sub-sector" (the term is not used in the Draft EIR) and does not provide a specific concern regarding the adequacy of the Draft EIR. Without a specific concern, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

### **Response WIL5-98**

This comment appears to contain seismic data that is unintelligible. It also does not define the term "sub-sector" (the term is not used in the Draft EIR) and does not provide a specific concern regarding the adequacy of the Draft EIR. Without a specific concern, West Basin is unable to provide a specific response. Regarding the use of SCEDC data, this comment repeats earlier incorrect concerns that information from the SCEDC was not used. As explained in the responses to comment WIL5-18 and WIL5-96, SCEDC information was used in the Draft EIR Section 5.6,

*Geology, Soils, and Seismicity*, on page 5.6-10 (SCEDC is a part of the Working Group on California Earthquake Probabilities), and 5.6-11.

Regarding active faults beneath the site, as explained in the response to comment WIL5-18, and as discussed in the Draft EIR, Section 5.6, *Geology, Soils, and Seismicity*, page 5.6-11, the proposed Project components are not located on any active fault.

### **Response WIL5-99**

The offshore facilities consist of the existing intake and outfall tunnels, and proposed intake and discharge structures, which are located on the ocean floor approximately 2,500 feet from the shoreline and outside of the tsunami inundation area, as shown on Figure 5.9-3.

### **Response WIL5-100**

Impacts relating to tsunami, coastal flooding, wave run-up, and storm tides, including potential future risks from sea level rise, are assessed in detail in the Draft EIR Subsection 5.9.4 under Impact 5.9-6 (page 5.9-72 *et seq.*). The analysis evaluates potential impacts associated with constructing and operating each of the three primary elements of the proposed Project, including offshore, coastal, and inland Project components for both the Local and Regional Projects. No revisions to the Draft EIR have been made in response to this comment.

### **Response WIL5-101**

This comment does not identify a concern or comment on the adequacy of the Draft EIR. The comment consists of the acronym “TBR,” defined earlier in the comment letter as a comment to be revised or updated later. Without a specific concern to address, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

### **Response WIL5-102**

This comment does not identify a concern or comment on the adequacy of the Draft EIR. The comment consists of the acronym “TBR,” defined earlier in the comment letter as a comment to be revised or updated later. Without a specific concern to address, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

### **Response WIL5-103**

This comment highlights several words on page 5.9-47 but does not identify a concern or comment on the adequacy of the Draft EIR. The comment consists of the acronym “TBR,” defined earlier in the comment letter as a comment to be revised or updated later. Without a specific concern to address, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

### **Response WIL5-104**

The comment is unclear but appears to take issue with the fact that there are no other hazardous materials mitigation measures required for proposed Project facilities other than the screened

ocean intake and concentrate discharge facilities. As discussed in the Draft EIR on pages 5.9-41 through 5.9-43, Section 5.8, *Hazards and Hazardous Materials*, provides details of a mitigation measure developed for all construction groundwater dewatering effluent. Mitigation Measure HAZ-1, Waste Management Plan, requires West Basin or its contractor(s) to develop a groundwater dewatering control and disposal plan that identifies likely groundwater dewatering locations, the method to analyze groundwater for hazardous materials, and appropriate treatment and/or disposal methods. While this mitigation measure is not required to reduce or avoid a significant impact to water quality due to mandatory regulatory requirements, it is mentioned in Section 5.9, *Hydrology and Water Quality*, because implementation of the measure would further reduce, avoid and/or minimize the potential for hazardous contaminants to be present in dewatering discharges.

### **Response WIL5-105**

This comment highlights several words on page 5.9-56 but does not identify a concern or comment on the adequacy of the Draft EIR. The comment consists of the acronym “TBR,” defined earlier in the comment letter as a comment to be revised or updated later. Without a specific concern to address, West Basin is unable to provide a specific response. As a result, this comment has been noted for the record and no further response is necessary.

### **Response WIL5-106**

This comment requests minor formatting changes and direct public access to the cited sources in Draft EIR Section 5.9, *Hydrology and Water Quality*. The format of the citations does not affect the ability to accurately identify citations nor does it address the adequacy of the Draft EIR. Regarding the access to the cited sources, all of the cited sources used in the Draft EIR are available by request at the West Basin administrative office.

### **Response WIL5-107**

This comment requests minor formatting changes and direct public access to the cited sources in Draft EIR Section 5.9, *Hydrology and Water Quality*. The format of the citations does not affect the ability to accurately identify citations nor does it address the adequacy of the Draft EIR. Regarding the access to the cited sources, all of the cited sources used in the Draft EIR are available by request at the West Basin administrative office.

### **Response WIL5-108**

This comment requests minor formatting changes and direct public access to the cited sources in Draft EIR Section 5.9, *Hydrology and Water Quality*. The format of the citations does not affect the ability to accurately identify citations nor does it address the adequacy of the Draft EIR. Regarding the access to the cited sources, all of the cited sources used in the Draft EIR are available by request at the West Basin administrative office.

### **Response WIL5-109**

The presence and potential direct and indirect effects of the proposed Project on fish species and squid populations within Santa Monica Bay (SMB) and the marine study area are extensively covered in the Draft EIR Section 5.11, *Marine Biological Resources*; the fish taxa inhabiting

SMB in general, and the marine study area specifically, and their ecosystem roles are provided in the Draft EIR on pages 5.11-8, 5.11-15, 5.11-16, and 5.11-18 through 5.11-21. Similar information is provided for Market squid in the Draft EIR on pages 5.11-20-5.11-21 and in the Draft EIR on pages 5.11-31 through 5.11-36. The Draft EIR does not require an ecosystem model to assess potential Project effects on fish or Market squid. These were both considered and evaluated for all potential direct and indirect effects of the proposed Project as presented in the Draft EIR on pages 5.11-36 through 5.11-76. The comment implies that the Project will result in some type of plant/animal/biotic/nutrient level changes with no scientific data or studies to support this assertion. Potential effects on ecosystem productivity from intake and discharge shear stress entrainment are estimated by calculating potential Area of Production Foregone or Lost (APF), as required by the SWRCB. The Ocean Plan Amendments of 2015 can be viewed at: [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2015/rs2015\\_0033\\_sr\\_apx.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/rs2015_0033_sr_apx.pdf).

### **Response WIL5-110**

See response to comment WIL5-109.

### **Response WIL5-111**

The Draft EIR Subsection 5.11.2 describes the regional oceanographic conditions, marine habitats, and biological resources of SMB in general, and conditions which occur within the marine study area specifically; pages 5.11-12 through 5.11-18 present information on existing marine habitats and communities while commercial and recreational fishing and harvesting are discussed on pages 5.11-31 through 5.11-33. As presented in the impact analysis and discussion of proposed Project effects on marine taxa, habitats and ecosystems (Draft EIR pages 5.11-37 through 5.11-76) are considered for all direct and indirect impacts. Potential effects on ecosystem productivity from intake and discharge shear stress entrainment is estimated by calculating potential APF, as required by the SWRCB. The Ocean Plan Amendments of 2015 can be viewed at:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2015/rs2015\\_0033\\_sr\\_apx.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/rs2015_0033_sr_apx.pdf). See also response to comments to WIL5-109.

### **Response WIL5-112**

The Draft EIR identifies key infaunal, epifaunal, and macrobenthic marine taxa inhabiting both of the dominant seafloor habitats in the marine study area (soft and hard substrate) as well as within the pelagic water column (Draft EIR pages 5.11-12 through 5.11-23). The assessment of potential Project related effects on these taxa are discussed in the Draft EIR pages 5.11-37 through 5.11-76. The potential impact analysis assumed that all trophic levels and sub-groups within a trophic level would be potentially affected the same and have similar recoveries following the disturbance, as confirmed by scientific citations provided throughout the analysis.

### **Response WIL5-113**

The Draft EIR used common terms to describe biological organisms and communities, and their definitions can be easily found in a dictionary, available at: <https://www.dictionary.com/>.

### **Response WIL5-114**

See response to comment WIL5-67.

### **Response WIL5-115**

See response to comment WIL5-67.

### **Response WIL5-116**

See responses to comments WIL5-47 and WIL5-67.

### **Response WIL5-117**

See response to comment WIL5-67.

### **Response WIL5-118**

See response to comment WIL5-67.

### **Response WIL5-119**

See response to comment WIL5-67.

### **Response WIL5-120**

See response to comment WIL5-67.

### **Response WIL5-121**

See response to comment WIL5-47.

### **Response WIL5-122**

See response to comment WIL5-22.

### **Response WIL5-123**

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.

### **Response WIL5-124**

This comment does not address 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.

### **Response WIL5-125**

This comment requests information that is not relevant to the Draft EIR analysis. No response is necessary.

**Response WIL5-126**

This comment requests information that is not relevant to the Draft EIR analysis. No response is necessary.

**Response WIL5-127**

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.

**Response WIL5-128**

See response to comment WIL5-122.

**Response WIL5-129**

See response to comment WIL5-22.

**Response WIL5-130**

The definition of “anticipates” and “financial incentives” can be found in any online dictionary (<https://www.merriam-webster.com/dictionary/dictionary>).

While CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors, evidence of economic and social impacts that do not contribute to, or are not caused by physical changes in the environment, are not required to be addressed in an EIR (CEQA Guidelines Section 15064(f)(6)). See also *Master Response: Non-CEQA Issues*.

**Response WIL5-131**

The definitions of “viable, responsible, uncertain, dependence, and satisfy” are not meant to be technical and may be found in any online dictionary (<https://www.merriam-webster.com/dictionary/dictionary>). See also response to comment WIL-1 and WIL5-39.

**Response WIL5-132**

The comment refers to a reference that is cited within an EIR referenced document. The February 2012 Residence, Structure, and Object Record was prepared by the CA Resources Agency, Department of Parks and Recreation. West Basin has no control over and cannot alter these records.

**Response WIL5-133**

Refer to response to comment WIL5-6.

**Response WIL5-134**

Refer to response to comment WIL5-6.

**Response WIL5-135**

Refer to response to comment WIL5-6.

### **Response WIL5-136**

Refer to response to comment WIL5-6.

### **Response WIL5-137**

The comment does not specify any deficiencies in the Draft EIR analysis. As a result, this comment has been noted for the record and no further response is necessary. Please see *Master Response: Non CEQA Issues*.

### **Response WIL5-138**

The comment does not identify any concern or comment on the adequacy of the Draft EIR. As explained in the response to comment WIL5-18, and as discussed in the Draft EIR, Section 5.6, *Geology, Soils, and Seismicity*, page 5.6-11, the proposed Project components are not located on any active fault. As explained in the response to comment WIL5-98, if and when the proposed Project is approved by the West Basin Board of Directors, West Basin would conduct a final geotechnical investigation that would inform the final design of the Project, incorporate relevant mitigation measures from the EIR, and comply with all federal, state, and local regulations, including the California Building Code and local building codes.



## Response to Letter WIN: Carol Wingate

### Response WIN-1

NRG will still own the ESGS property proposed for use under the Project; West Basin will lease the necessary property from NRG. The proposed Project should have no effect on the tax revenue to the City of El Segundo.

### Response WIN-2

The proposed Project is a coastal-dependent industrial use proposed to be located on an industrially zoned site where industrial uses are or have been located. The Draft EIR evaluates aesthetic impacts of the proposed Project in Section 5.1, *Aesthetics, Light & Glare*, pages 5.1-9 through 5.1-29-. Land use impacts are discussed in Section 5.10, *Land Use and Planning*, pages 5.10-14 through 5.10-37. The Draft EIR also comprehensively addresses all other potential physical environmental impacts associated with implementing the proposed Project in Sections 5 and 6 of the Draft EIR. The proposed Project would construct a light industrial structure on coastal property that has historically been developed with power generating facilities. Replacement of portions of those facilities would soften the views compared to the existing industrial character. See *Master Response: Environmental Impacts to the El Porto Community*.

### Response WIN-3

As described in the Draft EIR Section 5.5.4, under “Electrical Energy Demand and Infrastructure” (page 5.5-20), Southern California Energy (SCE) is the electricity provider for demand associated with the proposed Project. Additionally, the Draft EIR concludes 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. Regarding the question of who will profit, West Basin will consider whether the proposed Project is in the best interests of the community. As a public agency, West Basin would not generate a profit on the creation of potable water that serves to stabilize water reliability and pricing. See *Master Response: Cost and Rates*.

### Response WIN-4

The comment questions how much CO<sub>2</sub> and other pollutants would be released by the proposed ocean water desalination facility. Greenhouse gas emissions are discussed in the Draft EIR in Subsection 5.7.4 beginning on page 5.7- 22. Air quality impacts are discussed in the Draft EIR in Subsection 5.2.4 beginning on page 5.2-22. GHG operational emissions are identified in Table 5.7-3 on page 5.7-24. Emissions of greenhouse gases CO<sub>2</sub>, CH<sub>4</sub>, and NO<sub>2</sub> are reported using the term carbon dioxide equivalents (CO<sub>2</sub>e). Net CO<sub>2</sub>e emissions for the proposed Project are stated to be 10,959 MTCO<sub>2</sub>e per year prior to mitigation. With implementation of mitigation, the emissions of CO<sub>2</sub> are found to be less than significant.

### Response WIN-5

The potential effect of increased salinity on marine biota and ecosystems is discussed in Draft EIR Section 5.11, *Marine Biological Resources*, on pages 5.11-56 through 5.11-58.

## **Response WIN-6**

The City of El Segundo can rezone the ESGS property as it sees fit. However, since the NRG facility will not be shutting down, it will remain on-site.

## **Response WIN-7**

West Basin has not finalized its funding portfolio for the proposed Project, but financing methods may include any combination of public-private partnerships (P3), low interest loans, grant funding, and traditional financing through bonds or capital loans. See also *Master Response: Cost and Rates*.

## **Response WIN-8**

The Draft EIR explores and evaluates other CEQA alternatives in Section 7.3, including an alternative at the AES Redondo Beach Generating Station (RBGS) (see Subsection 7.3.2). The Draft EIR provides a detailed analysis of alternatives as required by CEQA that explains the rationale for selecting the ESGS sites over other sites including the RBGS site. As stated in the Draft EIR on Section 7.4 Environmentally Superior Alternative page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

See also *Master Response: Water Supply Alternatives*.

## **Response WIN-9**

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. The public review period ended at 5 p.m. on Monday, June 25, 2018, providing a 91-day public review period.

## Response to Letter WOO: Darryl Woodcock

### Response WOO-1

#### WOO-1

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "...West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is more appropriate for the ocean water desalination facility, if and when the Project is considered for approval.

A Mitigation Monitoring and Reporting Program (MMRP) will be prepared for the proposed Project which will include a comprehensive plan of all mitigation measures to be implemented, the identity of the entities responsible for implementation and for monitoring, and timing requirements.

See also *Master Response: Water Supply Alternatives* and the analysis included in Draft EIR Section 7, *Alternatives to the Project*.

## Response to Letter YOCO: Colleen Young

### Response YOCO-1

The comment provides an introduction to subsequent comments. Contrary to the comment and as noted in Draft EIR Subsection 7.1.3, the Local and Regional Projects would result in significant and unavoidable impacts only on Air Quality and Noise during construction. The statement in the comment that the Draft EIR anticipates “significant environmental effects, direct, indirect, and cumulative environmental impacts of this project will occur in the following environmental areas: air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, transportation and traffic, noise, aesthetics, light and glare, terrestrial biological resources, marine biological resources, public services, utilities and service systems, recreation, land use and planning, cultural resources” is not correct. Several of these issues have less than significant environmental impacts or no environmental impacts. Please refer to Draft EIR Table 1-1 which provides a summary of impacts, mitigation measures, and conclusions for all topical areas evaluated in the Draft EIR.

### Response YOCO-2

The comment reiterates the significant and unavoidable findings on the Draft EIR related to air emissions during construction and noise during construction (pile driving). No response is warranted.

### Response YOCO-3

The Notice of Availability (NOA) correctly identifies the fact that the proposed 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.” Further information on the hazardous material sites in and/or near the proposed Project site is provided in the Draft EIR Subsection 5.8.4 in the discussion of Impact HAZ 5.8-3 on Draft EIR page 5.8-28.

### Response YOCO-4

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.

### Response YOCO-5

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.

### Response YOCO-6

The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community* for a discussion of traffic, noise, and air quality impacts to the El Porto Community.

## Response YOCO-7

To address encountering contaminated soil, Mitigation Measures HAZ-1 and HAZ-2 require preparation and implementation of procedures and protocols for training demolition and construction workers in recognizing hazardous materials, describing all waste streams, managing excavated soil, and testing of soils to identify the appropriate handling and disposal of soils. In addition, as explained in DEIR Section 5.2, *Air Quality*, in Impact AQ 5.2-1, page 5.2-23, the proposed Project would be required to comply with the South Coast Air Quality Management District (SCAQMD) requirements for controlling fugitive dust pursuant to SCAQMD Rule 403. Details of the procedures to comply with Rule 403 are listed in Mitigation Measure AQ-1 on page 5.2-40, and include watering of active work surfaces, covering of stockpiles, work prohibitions if wind speeds exceed 25-mile per hour, and the covering of trucks transporting soil off-site. Compliance with existing regulations and implementation of the mitigation measures would ensure contaminated materials are properly handled and contained to prevent fugitive dust and spillage from trucks transporting contaminated materials.

## Response YOCO-8

The commenter is referred response to *Master Response: Cost and Rates* and *Master Response: Environmental Impacts to the El Porto Community*.

## Response YOCO-9

Regarding impacts to the neighboring community, see *Master Response: Environmental Impacts to the El Porto Community*.

## Response YOCO-10

CEQA requires lead agencies to consider environmental effects associated with project approvals, but does not require any financial impact analysis regarding either the cost of the project itself, or potential impacts to property values for any parcels or communities adjacent to the project site. Nevertheless, locating a light industrial facility (desalination) in the middle of the existing NRG heavy industrial facility complex should not generally affect residential property or rental values in the adjacent communities. See *Master Response: Non-CEQA Issues*.

## Response YOCO-11

The water supply alternatives included in the Draft EIR Alternatives assessment (Subsection 7.2.1) include increased conservation, increased recycling, stormwater capture, increased non-potable reuse, and direct potable reuse. As determined in the Draft EIR, these supply alternatives would be implemented in addition to the proposed Project to establish a balanced water supply portfolio that maximizes the production of local water supplies. As described in detail in West Basin's Urban Water Management Plan (UWMP), the demand for water in the West Basin service area cannot be fully met with any one of the local water supply alternatives, but rather requires a balanced portfolio approach. Ocean desalination is one component of this balanced local water supply approach. For example, the need for 21,500 acre-feet per year (AFY) equates directly to the difference between total supplies and total demands (20,342 acre-feet) during a multi-dry year event similar to the 2012-2015 drought conditions, as shown in UWMP Table 5-5

and 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 2010 and 2015 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.

For more information, see also *Master Response: Water Supply Alternatives*, and *Master Response Greenhouse Gas Emissions and Energy Use*.

### **Response YOCO-12**

The Draft EIR Subsection 7.2.1 evaluates a stormwater capture alternative. As described in detail in Section 7 of the Draft EIR and in *Master Response: Water Supply Alternatives*, stormwater capture is problematic within the West Basin service area since percolation is not effective in conveying stormwater from the surface through the clay layers and into the potable aquifer. Stormwater injection would be required. For stormwater capture to be considered as a new local water supply for West Basin, stormwater runoff would not only have to be captured and stored within the West Coast Groundwater Basin when available, but it would also have to be produced as groundwater by West Basin's customer retail water agencies with groundwater rights. Furthermore, stormwater capture would not be available during a multi-dry year event. See Draft EIR Subsection 7.2.1, response to comment YOCO-11, and *Master Response: Water Supply Alternatives*.

### **Response YOCO-13**

This comment letter expresses concerns regarding (1) airborne contamination from disturbing contaminated soils, (2) transporting contaminated soil through city streets, (3) effects from the chemicals to be used in the desalination plant, and (4) the brine to be returned to the ocean.

As discussed in the Draft EIR Section 5.8, *Hazards and Hazardous Materials*, pages 5.8-12 through 5.8-14, West Basin is aware of the previous releases of hazardous materials at the ESGS site, specifically at the Surface Retention Basins and Gas Compressor Area in the North Site, and the former fuel storage tanks at the South Site.

As explained on pages 5.8-12 and 5.8-13, the Retention Basins at the North Site were cleaned out and closed in 2015. The investigations concluded that the use of the Retention Basins had not resulted in hazardous levels of metals, volatile organic compounds (VOCs), petroleum hydrocarbons, or polynuclear aromatic (PAHs) in groundwater or soils. The human health risk assessment concluded that the residual concentrations of the constituents of potential concern in soil were below industrial/commercial and construction worker risk levels. The investigations also concluded that the petroleum hydrocarbons and VOCs identified in the groundwater

throughout the ESGS facility are generally attributed to the petroleum hydrocarbon groundwater plume that has migrated from the Chevron Refinery plume to the east.

As explained on page 5.8-13, contaminated soil was removed from the Gas Compressor Area in the North Site. Post-excavation verification samples confirmed that the concentrations of vanadium and nickel, the chemicals of concern, in remaining soil are below background levels. In addition, four abandoned Chevron pipelines crossing the excavation area, along with 650 pounds of soil, were removed and sent to an off-site disposal facility permitted to accept the material.

As explained on pages 5.8-13 and 5.8-14, the above-ground fuel tanks and some contaminated soil was removed in 2011 and 2013 from the South Site. The location of the former tanks was capped and some shallow soil beneath the caps is contaminated with total petroleum hydrocarbons (TPH) in the gasoline, diesel, and motor oil range. Approximately 1,000 cubic yards of contaminated soil mostly limited to the top 18 inches of soil have TPH concentrations above regulatory standards.

The Draft EIR acknowledges and West Basin is aware of the contaminated soil beneath the former fuel tanks cap and also recognizes that the other sites discussed above may have residual levels of contaminated soil that, if disturbed, will require appropriate management. To address encountering contaminated soil, Mitigation Measures HAZ-1, *Waste Management Plan*, and HAZ-2, *Project Demolition and Construction Health and Safety Plans*, will be prepared and implemented to establish procedures and protocols for training demolition and construction workers in recognizing hazardous materials, describing all waste streams, managing excavated soil, and testing of soils to identify the appropriate handling and disposal of soils. In addition, as explained in the Draft EIR Section 5.2, *Air Quality*, in Impact AQ 5.2-1, page 5.2-23, the proposed Project would be required to comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Details of the procedures to comply with Rule 403 are listed in Mitigation Measure AQ-1 on page 5.2-40, and include watering of active work surfaces, covering of stockpiles, work prohibitions if wind speeds exceed 25 miles per hour, and the covering of trucks transporting soil off-site. Compliance with existing regulations and implementation of the mitigation measures would ensure contaminated materials are properly handled and contained to prevent fugitive dust and spillage from trucks transporting contaminated materials.

The chemicals to be used in the desalination facility are discussed in the Draft EIR, Section 3, *Project Description*, on pages 3-3 through 3-9, which describe the desalination facility and the chemicals that would be used to treat the seawater. As discussed in Section 5.8, *Hazards and Hazardous Materials*, page 5.8-20, the Hazardous Materials Business Plan (HMBP) program would require West Basin to prepare and implement an HMBP that would describe procedures and protocols for the safe storage, handling, transport, and disposal of hazardous materials. The HMBP would be submitted to the local Certified Unified Program Agency (CUPA), the El Segundo Fire Department Environmental Safety Division, for their review and approval. Compliance with all applicable federal and state regulations would ensure that chemicals are handled properly and that spill prevention and response procedures are in place.

Brine disposal procedures and process are discussed in the Draft EIR, Section 3, *Project Description*, on pages 3-12 and 3-13. Impacts to ocean waters from the discharge of brine are assessed in detail under Impact 5.9-2 (Draft EIR Subsection 5.9.4 page 5.9-49 et seq.). The assessment of impacts to water quality comprehensively applied and considered the applicable regulations discussed in the regulatory setting subsection (Draft EIR Subsection 5.9.1, et seq.), such as the Water Quality Objectives of the California Ocean Plan. The assessment of water quality impacts from the discharge of brine (Draft EIR Subsection 5.9.4) was incorporated into the analysis of impacts on marine biological resources potentially occurring due to changes in receiving water quality within the mixing zone at the outfall diffuser. As discussed in detail in the Draft EIR Subsection 5.11.4 (page 5.11-56), because water quality constituents would not exceed existing background levels at the edge of the Zone of Initial Dilution (ZID), the discharge of brine would not be expected to pose any risk to marine habitats and taxa, including special-status fish, marine mammals, and sea turtles.

### **Response YOCO-14**

The City of Los Angeles owns and operates Hyperion Water Reclamation Plant; not West Basin as the comment stated. Hyperion is a wastewater treatment facility that produces secondary effluent. In 1991 West Basin and City of Los Angeles reached an agreement to deliver treated sewer water from the City's Hyperion plant to West Basin Water Recycling Facility in El Segundo. The Draft EIR (Subsection 2.3.1; *Imported and Local Water Supplies*, on page 2-9) provides further detail of West Basin's Recycled Water Program. Today, West Basin produces approximately 40 MGD of non-potable and indirect potable reuse water for its service area, and relies on this long-term partnership with the City of Los Angeles for access to secondary effluent from the Hyperion Water Reclamation Plant (Hyperion). West Basin continues to explore the expansion of its Recycled Water Program and intends to increase capacity to allow for the recycling of 70 MGD of secondary effluent. However, 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 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 Section 7, West Basin as a responsible water supply manager is considering the addition of ocean water desalination to augment water supply reliability in addition to other local water supply development efforts. See also *Master Response: Water Supply Alternatives*.

### **Response YOCO-15**

West Basin is committed to partnering with regional agencies to maximize other local water supplies in addition to ocean water desalination. Ocean water desalination is just one component of a balanced local water supply approach, with the Local Project supplying approximately 10 percent of West Basin's total water demand. This type of water supply diversification balances benefits and risks associated with each supply type. Since ocean water desalination requires greater energy to produce, the portfolio approach provides a portion of water supply that would maximize the benefits of drought-proof reliability. Developing a drought-proof portion of the local water supply substantially increases water supply reliability resulting in fiscally and environmentally responsible water supply planning.



## **Response YOCO-16**

The commenter is referred to *Master Response: Cost and Rates* for a discussion of proposed Project costs. The Draft EIR Subsection 7.2.1 considered a range of water supply 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*. 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*.

## Response to Letter YOJE: Jefferson Young

### **Response YOJE-1**

While West Basin appreciates the comment, it does not specify any deficiencies in the analysis included in the Draft EIR. See *Master Response: Environmental Impacts to the El Porto Community* and *Master Response: Non-CEQA Issues*.

## Response to Letter YOJU: Julie Young

### Response YOJU-1

While the comment does not explicitly express a comment about the Draft EIR, the commenter may be concerned about impacts regarding the El Porto community. The commenter is referred to *Master Response: Environmental Impacts to the El Porto Community*.

### Response YOJU-2

While West Basin appreciates the comment, it does not specify any deficiencies in the analysis included in the Draft EIR; see *Master Response: Non-CEQA Issues* and *Master Response: Environmental Impacts to the El Porto Community*.

The Draft EIR evaluates two possible locations for the ocean water desalination facility throughout Section 5, *Environmental Analysis*. The North Site and South Site would both be located at NRG's facility in El Segundo and zoned the same Heavy Industrial (see the Draft EIR page 5.10-34). As stated in the Draft EIR on page 7-59, "... West Basin has concluded that the ESGS North Site is environmentally superior to the ESGS South Site." West Basin's Board of Directors will ultimately decide which site is most appropriate for the ocean water desalination facility, if and when the Project is approved.

The commenter is also referred to Section 5.11, *Marine Biological Resources*, for a discussion of environmental impacts related to sea life.

### Response YOJU-3

Air quality impacts are discussed in detail in the Draft EIR in Subsection 5.2.4 beginning on page 5.2-22. Noise impacts are discussed in detail in the Draft EIR in Subsection 5.12.4 beginning on page 5.12-14. Marine Biological Resources are discussed in detail in the Draft EIR in Subsection 5.11.4 beginning on page 5.11-38. Table 3-5 of the Draft EIR identifies estimated construction durations for each phase of the proposed Project. The Draft EIR concludes that there is potential for significant and unavoidable impacts related to air emissions during construction, particularly for daily pollutant mass emissions of NO<sub>x</sub>, and increased noise during pile driving associated with construction activities. More detail on the significant construction-related air quality impacts can be found in the Draft EIR on pages 5.2-33 and -34. All other air quality related impacts were found to be less than significant with mitigation.

## Response to Letter ZAN: Chad Zani

### Response ZAN-1

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. Please see *Master Response: Water Supply Alternatives*.

However, the brine discharge from the proposed Project will not sink to the ocean floor and kill everything, as suggested by the comment. As explained in Draft EIR Subsection 5.9.4, the brine modeling conducted for the proposed Project (Draft EIR Appendix 4C and Final EIR Appendix 14) demonstrates that operational discharges from the Local Project would meet the threshold of being less than 2 ppt above ambient conditions within the 100 meters (328 feet) from the point of discharge as prescribed in the California Ocean Plan. Therefore, brine discharges from the Local Project would not exceed or violate the California Ocean Plan salinity standards or degrade water quality in terms of salinity; impacts related to salinity would be less than significant.

## Response to Letter ZAR: Lori Zarenski

### **Response ZAR-1**

Although West Basin appreciates the concern, the comment does not specify any deficiencies in the Draft EIR analysis. It is unclear what “financial gain” is at stake since West Basin is a not-for-profit municipal utility. Regardless, West Basin conducts its procurement activities in accordance with standards for ethical conduct as recommended by the Institute for Supply Management (ISM) and the West Basin ethical procurement practices are detailed on their website: <http://www.westbasin.org/about-us/doing-business>. See also *Master Response: Cost and Rates*.

## Response to Letter ZAR2: Lori Zarenski

### **Response ZAR2-1**

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 warranted; see *Master Response: Non-CEQA Issues*.

### **Response ZAR2-2**

See response to comment ZAR-1.

## Response to Letter ZUA: Jacqueline Zuanich-Ferrell

### **Response ZUA-1**

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*.

## Response to Letter ZUA2: Jacqueline Zuanich-Ferrell

### **Response ZUA2-1**

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*.