bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission ✐ 320 west 4th street, ste 200; los angeles, california 90013
213/576-6615 phone ✐ 213/576-6646 fax ✐ santamonicabay.org

July 14, 2008

California Energy Commission
C/O Steve Munro, Compliance Project Manager
1516 Ninth Street, MS# 2000
Sacramento, CA 95814-5512
Via EMAIL: smunro@energy.state.ca.us

RE: Proposed Modifications to the El Segundo Power Redevelopment Project Staff Analysis: 00-AFC-14C

Dear California Energy Commissioners:

The staff of the Santa Monica Bay Restoration Commission (SMBRC) thanks you for the opportunity to comment on the staff analysis of proposed modifications to the El Segundo Power Redevelopment Project. The SMBRC is a locally-based state entity charged with restoring the Santa Monica Bay, a National Estuary under the USEPA's National Estuary Program. The mission of SMBRC is to improve the health and vitality of the Santa Monica Bay, its habitats, living marine resources, and watersheds. SMBRC operates as a partnership among numerous federal, state, and local entities and builds consensus for addressing pressing environmental issues facing the Santa Monica Bay and its watersheds.

The use of once-through cooling is one such issue and we are pleased that El Segundo Power II, LLC (ESP II) is proposing to end the use of once-through cooling technology at the El Segundo power plant. We are also pleased to see the staff analysis insist on certain conditions to certification, such as ensuring passage across the beach delivery area for emergency service vehicles (LAND-14), requiring the use of reclaimed water for needs that don't require potable water (WATER RES-4), and including a ballast water management plan (WATER QUALITY-10); however we have some outstanding concerns about the staff analysis as detailed below.

Removal of Condition BIO-1.
BIO-1 currently requires ESP II to provide the SMBRC with $5 million for restoration projects as one condition for the ESP-II redevelopment project. To date, the SMBRC has received $1 million, all of which has been encumbered and over 75% of which has been spent on crucial habitat assessment and enhancement work. While the staff analysis contains a proposed deletion of the BIO-I condition, we want to be sure that the analysis is clarified to note that, while the $4 million currently due and owing to the SMBRC would not be paid under the proposed changes to ESP-II, the $1 million already paid by ESP II will not be reimbursed.

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Condition VIS-1.
The following quote makes it clear that the Energy Commission intends ESP II to use seacliff buckwheat in the project's landscaping: "The seacliff buckwheat meets these criteria [native species and/or species requiring little or no irrigation] and should be included in the landscaping plan. To help native plant species succeed where efforts are made to establish them, the non-native and aggressive iceplant should be removed to prevent it from out-competing native dune vegetation due to its dense character and vigorous growth" (Biological Resources, pg 4.2-4). We are therefore surprised to see that this is not reiterated in condition **VIS-1**. We recommend condition **VIS-1** include the above quoted lines.

The SMBRC has extensive experience in beach bluff restoration. Our Beach Bluff Restoration Project Master Plan (2004) has guided native planting throughout the South Bay area. We have worked in close partnership with the SEA Lab, the LA Conservation Corps, City of Redondo Beach and LA County Beaches and Harbors to implement successful bluff restoration projects and would be happy to be partner with ESP II for more restoration work.

Other Concerns.
The proposed modifications include relocating the northern end of the seawall further west. The staff analysis recognizes this will have an impact on joggers and bicyclists on the bike path (Noise and Vibration, pg 4.6-2), but does not discuss what this impact will be or how ESP II plans to minimize this impact. Nor does it give conditions for certification to ensure this impact is minimized. We would like to see the staff analysis address this oversight.

Finally, we would like to know what ESP II is intending to do with the existing sea-water intake pipe and tunnel. Will this infrastructure be permanently closed? Will it be shut off in a way that would allow it to be used in the future? Or would it be left as is?

The proposed modifications improve the project greatly and we generally support the proposal. Thank you for the opportunity to comment on the staff analysis. We hope the Energy Commission will take our comments into consideration. We look forward to reading the Addendum when it becomes available.

Sincerely,

Lia Protopapadakis
Marine Policy Specialist