

September 24, 1997

Mr. Bruce Kaneshiro, Project Manager
Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104

**RE: COMMENTS ON THE MITIGATED NEGATIVE DECLARATION FOR
SOUTHERN CALIFORNIA EDISON COMPANY'S APPLICATION FOR
DIVESTITURE AND SALE OF POWER PLANTS (Docket No. 96-11-046)**

The comments of the City of Redondo Beach on the subject application are contained in my letter to you dated September 23, 1997, included as Exhibit "A" to the attached Resolution of the City Council authorizing the filing of these comments. Please notice that the Resolution recites that these comments were reviewed and approved by the City Council after a public meeting thereon. They reflect the strong feelings of the City Council and the people of Redondo Beach on this subject.

Very truly yours,

PAUL CONNOLLY
City Manager

cj

cc: Public Utilities Commission

RESOLUTION NO. 7955

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH,
CALIFORNIA, APPROVING AND AUTHORIZING THE FILING OF CERTAIN
DOCUMENTS IN THE PROCEEDING BEFORE THE CALIFORNIA PUBLIC UTILITIES
COMMISSION (DOCKET NO. 96-11-046) REGARDING THE PROPOSED MITIGATED
NEGATIVE DECLARATION FOR THE APPLICATION OF SOUTHERN CALIFORNIA
EDISON COMPANY FOR DIVESTITURE AND SALE OF ITS FOSSIL FUEL
GENERATING PLANTS, INCLUDING ITS REDONDO BEACH PLANT

WHEREAS, on April 9, 1997 the City of Redondo Beach submitted comments on the scope and content of environmental review for the application by Southern California Edison (Docket No. 96-11-046) for divestiture and sale of its fossil fuel generating plants, including its Redondo Beach plant, as set forth in Exhibit "C" herein; and

WHEREAS, on July 2, 1997 the City of Redondo Beach submitted further comments on the Draft Initial Study consisting of 33 specific items covering the need for technical corrections with requests for further study and information on anticipated local impacts which were not addressed in the draft document, as set forth in Exhibit "B" herein; and

WHEREAS, on September 23, 1997, this City Council held an additional regular meeting at which time it reviewed, with input from the public, additional comments to be submitted for the proposed Mitigated Negative Declaration prepared for this project, as set forth in Exhibit "A" herein.

NOW THEREFORE, the City Council of the City of Redondo Beach does resolve as follows:

SECTION 1.

1. That it hereby approves and authorizes the filing of the comments on the proposed Mitigated Negative Declaration of the application of Southern California Edison Company regarding the divestiture and sale of its fossil fuel generating plants, including its Redondo Beach plant, (Docket No. 96-11-046) as set forth in Exhibit "A" herein.

[\[Begin CRB-0\]](#)

2. That this City Council, in submitting the comments set forth in Exhibit "A" herein and resubmitting the comments set forth in Exhibit "B" and "C" herein, hereby expresses to the California Public Utilities Commission and its consultant, Environmental Science Associates (ESA), its strong belief and finding that mitigation measures have not been incorporated into the proposed Mitigated Negative Declaration to reduce all the reasonably foreseeable impacts of the project to less than significant; provided, however, that this City Council does not request that the Commission determine that an Environmental Impact Report (EIR) be required for this project.

[\[End CRB-0\]](#)

SECTION 2. The City Clerk is hereby authorized and directed to send a copy of this Resolution with exhibits to each member of the California Public Utilities Commission, to the Executive Director of the Commission, to the General Counsel of the Commission, to Environmental Science Associates (ESA), to the South Bay Council of Governments, and to the State Clearinghouse.

SECTION 3. The City Clerk shall certify to the passage and adoption of this resolution, shall enter the same in the book of Resolutions of said City, and shall cause the action for the City Council in adopting the same to be entered in the official minutes of said City Council.

Passed, approved, and adopted this 23 day of September, 1997.

/s/ _____
Mayor

ATTEST

City Clerk

(SEAL)

APPROVED AS TO FORM:

/s/
City Attorney

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES ss

CITY OF REDONDO BEACH

I, JOHN OLIVER, City Clerk of the City of Redondo Beach ,California, do hereby certify that the foregoing resolution, being Resolution No. 7955 was passed and adopted by the City council, at an additional regular meeting of said Council held on the 23rd day of September, 1997, and thereafter signed and approved by the Mayor an attested to by the City Clerk of said City, and that said resolution was adopted by the following vote:

AYES: Council members Bisignano, Sullivan, Gin Pinzler, and White.

NOES: None.

ABSENT: None.

City Clerk of the City of
Redondo Beach, California

September 23, 1997

Bruce Kaneshiro, Project Manager
c/o Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, California 94104

VIA: electronic mail esa.sf@ix.netcom.com
and facsimile 415-896-0332

Dear Mr. Kaneshiro:

The City of Redondo Beach is pleased to have the opportunity to provide comments on the Mitigated Negative Declaration for Southern California Edison Company's Application No. 96-11-046.

Following our review of this document, it is our opinion that insufficient information is contained in the Initial study to justify finding of no significant impact in several areas. These areas are discussed in our comments below. Absent this additional analysis, many conclusions of this study appear unsubstantiated.

[\[Begin CRB-1\]](#)

1. Section 15206 of the California Environmental Quality Act Guidelines (Guidelines) prescribes that the Negative Declaration or EIR for projects of Statewide, Regional or Areawide Significance shall be submitted to the State Clearinghouse and the appropriate Council of Governments. Our review of the distribution listing does not indicate that these organizations have received service of the documents. This requirement is also contained in Section 15073(c) of the Guidelines.

[\[End CRB-1\]](#)

[\[Begin CRB-2\]](#)

2. Appendix G of the Guidelines contains a listing of effects of a project, which are normally deemed significant. As evidenced in the comments listed below, it is our opinion that the project may have significant effects in that:
 - a. The project could conflict with adopted environmental plans and goals of the community where it is located.
 - b. The project may encourage activities, which result in the use of large amounts of fuel, and water.
 - c. The project could increase substantially the ambient noise levels for adjoining areas, and,
 - d. The project could create potential public health hazard or involve the use, production and

disposal of materials, which pose a hazard to people or animal or plant populations in the area affected.

[\[End CRB-2\]](#)

[\[Begin CRB-3\]](#)

3. Page 4 of the Mitigated Negative Declaration (MND) contains a typographical error. The third paragraph, first sentence should read ". . . consultation or evaluation of [or] a qualified archeologist . . ."

[\[End CRB-3\]](#)

[\[Begin CRB-4\]](#)

4. Page 2.5 notes that Edison would provide, "An indemnity for specific categories of known and unknown liabilities, subject to certain exceptions." With respect to environmental liabilities, please specify what categories of known and unknown liabilities would be subject to indemnification and which would be exempted. As statement following this sentence notes that Edison would "generally" be responsible for conditions, which pre-date the sale, subject to certain limitations. In view of the project involves transfer of ownership, the assignment of environmental liabilities may have a significant effect on the timing and cost of site remediation. Therefore, a complete disclosure of the nature and extent of environmental contamination including costs of remediation should be included for each divested facility.

[\[End CRB-4\]](#)

[\[Begin CRB-5\]](#)

5. Page 4.9.13 states that ". . . appropriate Phase I and Phase II Environmental Site Investigations have been conducted." However, elsewhere in the document it states that the Phase Two Investigation is underway at the Redondo facility. If such analysis is complete, the results of such studies should be included, as such results were included for other plants analyzed in the initial study. (Example San Bernadino)

[\[End CRB-5\]](#)

[\[Begin CRB-6\]](#)

6. Page 2.8 contains a typographical error in the first paragraph. A space should be inserted between the words "easement" and "and".

[\[End CRB-6\]](#)

[\[Begin CRB-7\]](#)

7. Page 4.1.7 states that Redondo Beach's Harbor/Civic Center Specific Plan serves as the Local Coastal Plan. Therefore, absent local coastal permit authority, any project will be required to be submitted to the California Coastal Commission for consideration.

[\[End CRB-7\]](#)

[\[Begin CRB-8\]](#)

8. Page 4.11.190 discusses the shift in regulatory structure and indicates that, "This new regulatory structure would shift regulatory authority over divested sites and facilities to local jurisdiction." Included in this new regulatory responsibility are permitting authority and hazardous materials oversight and regulation. Although local jurisdiction is desired, the impact of these additional responsibilities on the Planning, Building, Fire and Engineering Departments will be significant, as personnel training or the hiring of new employees with expertise in these fields will be required. Under current budgetary constraints this impact is significant. Appropriate mitigation to offset the service delivery impact should be required.

[\[End CRB-8\]](#)

[\[Begin CRB-9\]](#)

9. Pages 4.1.16, 4.1.17 and 4.1.25 conclude that the plans are consistent with the uses intended under the applicable General Plans and Zoning Ordinances. This issue was raised in conjunction with the consideration of an application by Edison for a Lot Line Adjustment at the Redondo Beach facility. The Planning Commission or the City Council on appeal is responsible for making this determination with appropriate input and recommendations of staff. Since Edison has not proceeded to re-file an application for partitioning of the subject property, which potentially raises the issues of zoning consistency and General Plan conformance, a determination on this issue has not been made.

[\[End CRB-9\]](#)

[\[Begin CRB-10\]](#)

10. Page 3.1 of the Draft Initial Study stated that, "With divestiture, any new buyer . . . would have a strong incentive to operate the facility up to its available capacity. . ." However, Language in the Revised Initial Study has been revised to consider additional operation as "probable." Please include any new or additional information, modeling or other studies, which support the new conclusion.

[\[End CRB-10\]](#)

[\[Begin CRB-11\]](#)

11. As commented on the Initial Study, the Redondo Beach facility has been operated as a load following plant for over 10 years, operating at approximately 30% of capacity. Any increase in operation will result in significant, quantifiable environmental impacts. Increased levels of operation have been shown to have significant environmental impacts, which require mitigation. Analysis of these impacts was performed in the environmental review process for the proposed merger of southern California Edison with San Diego Gas and Electric in 1990 and the proposed installation of Selective Catalytic Reduction

(SCR) in 1992. Any increase in operation of the facility is expected to result in significant impacts in the following areas: Noise, Fish Population, Air Emissions and Transportation and Storage of Hazardous Materials (particular Aqueous Ammonia and Vanadium Pentoxide Catalyst).

[\[End CRB-11\]](#)

[\[Begin CRB-12\]](#)

12. The Mitigated Negative Declaration and Initial Study now contain two Figures. One depicts the Redondo Beach Facility with a lot line adjustment the other without. Text in the document indicates that the project does not include the consideration of a lot line adjustment. Please clarify the correct description of the project. The reparcelization of the existing facility raises significant issues related to land use and zoning. Specifically, the operation of a bulk fuel storage area as a separate use is not recognized as a permitted activity under local land use standards. A determination as to whether this use would be considered ancillary to the operation of the power plant has not been made at this time. Further, reparcelization appears to result in irregular lot configuration and raises significant concerns with respect to access, circulation, and adequacy of streets, storm drains and other infrastructure. A determination as to conformance with local Zoning and Building requirements has not been made, due to the fact that Edison has not produced information to demonstrate conformance. A full analysis of the effects of the physical land division should be required to each facility proposed for divestment. (See comment No. 9)

[\[End CRB-12\]](#)

[\[Begin CRB-13\]](#)

13. The Redondo Beach General Plan and Harbor/Civic Center Specific Plan contain numerous primary and supplemental land use policies which mandate comprehensive planning for the reuse of the subject site for non-industrial use, in anticipation of the end of the economic and physical life of the plant. Units 1-4 were installed in 1948 and 1949 and are in long term shutdown. Unit 4 is occasionally operated to provide auxiliary plant steam. The age of the equipment, and of the inefficient heat rate of these units have been stated to make these units uneconomical to operate. Units 7 and 8 began operation on 1967 and are moderately efficient when compared to new generation technologies.

For the above reasons, environmental analysis should consider two project alternatives; reuse of the subject property for non-industrial development and repowering of the facility with new modern and efficient equipment. Either scenario is reasonably foreseeable in view of the age of the facilities. In the event that repowering is evaluated, detailed analysis and modeling with respect to noise, vibration and emissions should be conducted on a local level. In evaluating reuse, the potential development of the transmission corridors in conjunction with the plant site must be considered.

[\[End CRB-13\]](#)

[\[Begin CRB-14\]](#)

14. The City of Redondo Beach commented on the Draft Initial Study, Page 3.4, which stated that preliminary analysis "suggests" that the Redondo Beach Station is likely to be repowered. The City requested a full discussion of repowering technologies and disclosure of the potential environmental effects of repowering should be included as the incentive to repower is directly related to the divestment. Page 3.3 of the current document limits the scope of reasonably foreseeable projects and considers many factors "too speculative". What rationale was employed in eliminating consideration of the effects of repowering?

[\[End CRB-14\]](#)

[\[Begin CRB-15\]](#)

15. Thank you for correcting the zoning designation of the property. Originally, Page 4.1.14 state that, "The General Zoning requirements for the Redondo generating station are set forth in the City's Harbor/Civic Center Specific Plan." This statement was corrected to specify the zoning requirements are in the City's Ordinance.

[\[End CRB-15\]](#)

[\[Begin CRB-16\]](#)

16. Page 4.16.11 lists community projects within one mile of the project site. The two projects listed below are not included. Any discussion of surrounding uses and impacts on uses in the area under new operational scenarios should include two reasonably foreseeable projects in the immediate surrounding area. Specifically, the Catalina Technology Center, a 293,000 square foot, mixed use (retail, office incubator industrial and storage) projects, is approved and set to commence construction in October 1997. The project will be constructed on portions of the Edison-owned property immediately east of the main generating site. A second project consisting of a 50,000 square foot, 16-screen cinema with 15,000 square feet of additional retail is in the planning stages. Under increased operational scenarios or repowering, the impacts to these projects, which were under current operational conditions may be significant.

[\[End CRB-16\]](#)

[\[Begin CRB-17\]](#)

17. Page 4.9.6 specifies the content of one underground storage tank at the plant. The content of two other tanks is not listed. Please specify what products are stored in these tanks.

[\[End CRB-17\]](#)

[\[Begin CRB-18\]](#)

18. Page 4.9.7 discusses risk of upset associated with storage and use of hazardous materials. It is essential that any new owner establishes direct communication with local Fire department specialists and obtains all necessary emergency plans and materials. In order to ensure that any new owner is provided with informational materials, training documents and local contact information, a mitigation measure should be included to

require these actions.

[\[End CRB-18\]](#)

[\[Begin CRB-19\]](#)

19. Page 4.9.8 concludes that the project is likely to affect emergency response plans. However, should a Lot Line Adjustment be approved, a reconfiguration will be required. A mitigation measure should be required to condition revision to plans in the event of approval of the property's reconfiguration.

[\[End CRB-19\]](#)

[\[Begin CRB-20\]](#)

20. Page 4.10.3 states that, "Noise from plants located more than 0.5 miles from an existing or anticipated noise sensitive land use . . . would not be expected to affect such sensitive uses. . ." How was this standard selected?

[\[End CRB-20\]](#)

[\[Begin CRB-21\]](#)

21. Page 4.10.9 describes the background noise impact of Pacific Coast Highway. Pacific Coast Highway is greater than 0.5 miles from the generating station and the sensitive receptors identified in the study, yet the background contribution is still acknowledged. It is therefore logical to include analysis of the effects of plant noise at a greater distance than 0.5 miles. Historically, certain noise corridors have been identified which subject sensitive receptors to significant exposures at a greater distance.

[\[End CRB-21\]](#)

[\[Begin CRB-22\]](#)

22. Page 4.10.9 describes the property line wall of the tri-level condominium facility as being 10 feet tall and being adjacent to Herondo Street. The wall in fact extends approximately 42" above the grade of the condominium and faces Catalina Avenue.

[\[End CRB-22\]](#)

[\[Begin CRB-23\]](#)

23. Page 4.10.10 indicates that for the current study one noise measurement was taken in or on the north side of Herondo Street at Herondo Avenue then discusses surrounding uses. Although this measurement was taken with all units operating, the location of the measurement was in the City of Hermosa Beach and most distant from the noise source and the sensitive receptors in Redondo Beach. Therefore, this measurement does not accurately support any conclusion that the facility is currently in compliance with local noise standards.

[\[End CRB-23\]](#)

[\[Begin CRB-24\]](#)

24. Page 4.10.11 concludes that increase operations could result in relatively small noise level increases. Absent documentation that the facility is currently in compliance, any increased noise could have a significant impact. A fully acoustical analysis to establish baseline data should be required as a mitigation measure to demonstrate compliance.

[\[End CRB-24\]](#)

[\[Begin CRB-25\]](#)

25. Page 4.11.6 discusses private security and speculates that any new owner may not provide for private security. Under current budgetary constraints, the need to provide police services to the facility is considered significant impact.

[\[End CRB-25\]](#)

[\[Begin CRB-26\]](#)

26. Page 4.12.4 contains discussion of sewer impacts. The existing Edison facility presently discharges into an over-capacity 18" sewer line, which transects the subject site. The minimal employment increase expected may not alone be significant. However, when related projects, such as the Catalina Technology Center, the Crown Plaza Hotel Expansion and the Portofino Hotel expansion are included, any increase in flow could be significant. The related projects are required to mitigate their sewer impact through the payment of impact fees. Mitigation of the impact to the sewer system should be required. The City has planned a sewer improvement project, and requested Edison's participation in the project. However, as of this writing Edison has declined to participate in the required upgrades.

[\[End CRB-26\]](#)

[\[Begin CRB-27\]](#)

27. Page 4.13.6 states that the plant is visually compatible with views from the east and surrounding industrial uses. Not acknowledged in this statement is that nearly all industrial uses to the east will be redeveloped shortly. The basis for this statement of compatibility is not documented. The City is on record over a period of at least 10 years as considering this view of the facility as extremely incompatible with the community and destructive to the scenic vista of the harbor.

[\[End CRB-27\]](#)

[\[Begin CRB-28\]](#)

28. Page 4.15.10 should discuss the fact that the City has historically utilized once-through cooling water to heat a public swimming facility, the "Seaside Lagoon". Due to damage from the Northridge Earthquake the supply structures are no longer serviceable. With the transition of the facility to private operation, the availability of heating and circulation water, to a public park facility is considered an impact.

[\[End CRB-28\]](#)

The City of Redondo Beach looks forward to your careful consideration of these comments and inclusion of appropriate mitigation measures following additional study. The environmental sensitivity of the site warrants a thorough and complete evaluation in order to ensure that the impacts of this project can be mitigated to a less than significant level.

Thank you for the opportunity to provide you with this input at this stage of the environmental review process. Please contact Aaron Jones at 310-318-0637 should you have any questions or need clarification.

Sincerely,

/s/

Paul Connolly
City Manager

/s/

Aaron Jones
Economic Development Administrator

cc: Mayor and City Council
Jerry Goddard, City Attorney
Steve Huang, City Engineer and Building Official
Pat Aust, Fire Chief
Mel Nichols, Chief of Police

City of Redondo Beach California
415 Diamond Street
P.O. Box 270
Redondo Beach, California 90277-0270

July 2, 1997

Bruce Laneshiro and Martha Sullivan, Co-Project Managers
California Public Utilities Commission
c/o environmental Science Associates
301 Brannan Street, Suite 200
San Francisco, CA 94107

Dear Bruce Laneshiro and Martha Sullivan:

The City of Redondo Beach is pleased to have the opportunity to provide comments on the Draft Initial Study for Southern California Edison Company's Application No. 96-11-046. We offer the following comments:

1. Page 2.7-Please identify which Edison Facilities presently have radial lines and will be subject to Radial Line Agreements.
2. Page 2.7-With respect to environmental liabilities, please specify what categories of known and unknown liabilities would be subject to indemnification and which would be exempted.
3. Information on the nature and extent of environmental contamination including costs of remediation should be disclosed for each divested facility. Property on which the Redondo Beach facility is located has been in industrial use since the early 1900's. Remediation costs will have a major influence on the sale of this asset, decisions on which portions of the facility to retain, and the likelihood of alternative, non-industrial development of the property.
4. Page 2.35 provides a description of facilities to be sold and those to be retained. The document should note that in order for Edison to divest the power block yet retain the transmission, fuel storage and switchyards approval of a physical land division of the subject site is required. Edison filed an application for Lot Line Adjustment on June 11, 1997 which was subsequently reviewed and rejected as incomplete on July 1, 1997. The impacts of the division of properties at each facility should be included in the environmental analysis. Issues related to conformance with building and zoning requirements are created as a result of the proposed reconfiguration for separate sale.
5. The Ormond Beach facilities map has been incorrectly inserted into the Draft document.
6. The configuration of the retained parcel at the Redondo Beach Station has been modified by Edison. Please ensure that the facilities map and area calculations are updated.
7. Page 3.1 states that, "With divestiture, any new buyer...would have a strong incentive to operate the facility up to its available capacity..." The Redondo Beach facility has been

operated as a load following plant for over 10 years, operating at approximately 30% of capacity. Any increase in operation will result in significant, quantifiable environmental impacts. Page 3.4 of the Draft Initial Study projects an expected capacity factor of 69.9% with divestiture. Such increased levels of operation have been shown to have significant environmental impacts which require mitigation. Analysis of these impacts was performed in the environmental review process for the proposed merger of Southern California Edison with San Diego Gas and Electric in 1990 and the proposed installation of Selective Catalytic Reduction (SCR) in 1992. Any increase in operation of the facility is expected to result in significant impacts in the following areas: Noise, Fish Population, Air Emissions and Transportation and Storage of Hazardous Materials (particularly Aqueous Ammonia and Vanadium Pentoxide Catalyst).

8. The proposed divestment documents indicate that SCE desires to reparcelize the present 47 acre facility and retain ownership of transmission facilities, certain pipelines and fuel oil storage tank areas. The operation of a bulk fuel storage area as a separate use is not recognized as a permitted activity under local land use standards. Further, reparcelization results in an irregular subdivision pattern and raises significant concerns with respect to access, circulation, adequacy of streets, stormdrains and other infrastructure. A full analysis of the effects of the physical land division should be required of each facility proposed for divestment.

These impacts were studied in previous environmental documents prepared for the Proposed Merger of Southern California Edison with San Diego Gas and Electric and the Installation of Selective Catalytic Reduction (SCR) equipment. Impacts should be identified and analyzed under new operational scenarios. It is anticipated that significant impacts will occur in the areas of, fish and wildlife (entertainment), noise, air emissions, hazardous materials (catalist and ammonia transportation) and public services (fire protection, emergency management). Each of these issues has been the subject of significant past analysis and is certainly relevant and critical to this analysis of increased operational scenarios.

9. There is a typographical error in the second sentence of the second paragraph on page 2.7.
10. The Redondo Beach General Plan and Harbor/Civic Center Specific Plan contain numerous primary and supplemental land use policies which mandate comprehensive planning for the reuse of the subject site for non-industrial use, in anticipation of the end of the economic and physical life of the plant. Units 1-4 were installed in 1948 and 1949 and are in long term shutdown. Unit 4 is occasionally operated to provide auxiliary plant steam. The age of the equipment, and the inefficient heat rate of these units have been stated to make these units uneconomical to operate. Units 7 and 8 began operation in 1967 and are moderately efficient when compared to new generation technologies.

For the above reasons, environmental analysis should consider two project alternatives; reuse of the subject property for non-industrial development and repowering of the facility with new modern and efficient equipment. Either scenario is reasonably

foreseeable in view of the age of the facilities. In the event that repowering is evaluated, detailed analysis and modeling with respect to noise, vibration and emissions should be conducted on a local level. In evaluating reuse, the potential development of the transmission corridors in conjunction with the plant site must be considered.

11. All full analysis of the site contamination including soils and ground water remediation requirements should be incorporated into the environment documents. The industrial use of the property since the late 1800's can be reasonably expected to have resulted in contamination. Contamination has been documented on adjacent properties. The nature and extent of this contamination and the potential exposure of the public to health risks should be disclosed and analyzed.
12. Page 3.4 states that preliminary analysis "suggests" that the Redondo Beach Station is likely to be repowered. A full discussion of repowering technologies and disclosure of the potential environmental effects of repowering should be included as the incentive to repower is directly related to the divestment.
13. In Section 4, page 4.1.1 impacts to land use and planning are considered to be less than significant with the exception of "agricultural resources". As discussed earlier in these comments, the project results in significant land use and planning impacts, including the creation of a non-conforming and in fact prohibited use. These impacts should be considered significant and analysis of conformance to local General Plan and Zoning criteria should be included.
14. Little discussion or analysis of alternative reuse is included in the Draft Initial Study. In view of the fact that the "project" includes the retention of substantial portions of all existing generating facilities, site specific analysis should be included in the environmental documentation as to the reasonably foreseeable uses of the retained properties.
15. Page 4.1.14 states that, "The General Zoning requirements for the Redondo generating station are set forth in the City's Harbor/Civic Center Specific Plan." This statement should be corrected to specify the zoning requirements are in the City's Zoning Ordinance. Also in need of correction is the zoning designation of the subject property. The correct designation is Public-Generating Plant (P-GP).
16. Page 4-1-18 states that the, "Redondo generating station is consistent with the land use designated by the City of Redondo Beach General Plan" and that, "A review of environmental impact reports for the general plan...indicates no conflicts with environmental plans or policies at the local...level." As previously discussed, the operation of a fuel oil storage facility or "tank farm" is not a permitted use in this zone. The operation of a "private utility" also raises a significant question as to the conformance of this use with applicable zoning and General Plan designations. Therefore, following divestment and partitioning of the property, the uses will be in conflict. In terms of policy, the General Plan and Harbor/Civic Center Specific Plan clearly establish a policy to, "plan for the adaptive reuse in anticipation of the end of the useful life..." Therefore, the project is also inconsistent with the City's stated policy. The "conclusion" on Page 4.1.22 should be modified.

Any discussion of surrounding uses and impacts on uses in the area under new operational scenarios, should include two reasonably foreseeable projects in the immediate surrounding area. Specifically, the Catalina Technology Center, a 293,000 square foot, mixed-use (retail, office, incubator industrial and storage) project, is approved and set to commence construction in August, 1997. The project will be constructed on portions of Edison-owned property immediately east of the main generating site. A second project consisting of a 50,000 square foot, 16 screen cinema with 15,000 square feet of additional retail is in the planning stages. Under increased operational scenarios or repowering, the impacts to these projects, which were assessed under current operational conditions may be significant.

17. Page 4.1.25 contains a typographical error in the conclusion section.
18. Page 4.1.28 states that the project will not, "Include any change in the operational or land use conditions of the power plant sites..." We disagree with this conclusion for the reasons in the comments stated herein. An analysis of these changes and an assessment of the impacts of these changes is warranted.
19. Page 4.3.20 acknowledges the susceptibility of the subject site to liquefaction. During the recent Northridge earthquake the Redondo Beach Seaside Lagoon, adjacent to the Edison facility sustained major damage and closure due to liquefaction. Mention of this event and analysis of the liquefaction potential should be included in the analysis.
20. Page 4.3.23 points out that remediation activities could have impacts related to erosion. The Redondo Edison facility is also the site of a historical salt marsh named, "Lake Salina". Anthropological resources are known in the immediate vicinity including an ancient Gabrieleno Indian Village named "Engiva". Any soils disruption may have the potential to disrupt significant archaeological resources.
21. Page 4.6.4 states that, "continued operation of the power plants...would not chance access for emergency vehicles..." However, the proposed partitioning of the properties will result in a need to re-configure emergency vehicle access. Discussion of emergency vehicle access constraints should be included and appropriate mitigation required.
22. Page 4.7.6 appears to make the assumption that fisheries in the Santa Monica Bay are "compromised". Redondo Beach has and continues to derive a major revenue source from sport fishing. The entrainment impacts of additional cooling water use are significant to fish populations and should be included in the analysis.
23. Page 4.9.6 contains the statement that, "New owners are expected to change the operating conditions..." The degree to which these conditions could expose the public of risk of upset is stated as "unknown". As previously commented, any increased operation is likely to result in the increased use of acutely hazardous materials and the transportation of these products on local streets. In view of the degree of uncertainty, additional study is essential. Further, mitigation will be essential to ensure the public health, safety and welfare.
24. Page 4.9.8 should include a discussion of Vanadium Pentoxide under the category of

hazardous waste.

25. Page 4.9.10 indicates that future study of contamination is "likely to take place in the future. For reasons stated above, additional study is warranted immediately and the results of these studies should be evaluated in environmental documentation.
26. Page 4.11.6 discusses private security and speculates that any new owner may not provide for private security. Under current budgetary constraints, the need to provide police services to the facility is considered significant impact.
27. Page 4.11.9 concludes that there may be an increased demand for school facilities. However, no mention of the fact that several Redondo Beach schools are operating at 100 percent capacity. Therefore, the addition of any student population is considered significant.
28. Page 4.12.2 contains discussion of sewer impacts. The existing Edison facility presently discharges into an over-capacity 18" sewer line which transects the subject site. Any increase in demand on this sewer line is considered significant. Further, the City has planned a sewer improvement project, and requested Edison's participation in the project. However, as of this writing Edison has declined to participate in the required upgrades.
29. Page 4.13.9 acknowledges that any modifications to the facility could have adverse impacts on scenic views. In conjunction with recent public hearings on the Catalina Technology Center, surrounding residents substantiated their sensitivity to view obstruction. The obstruction of scenic vistas should be considered significant and analyzed in the subsequent environmental documentation.
30. Page 4.14.10 makes reference to ethnographic resources. As discussed in earlier comments, the likelihood of discovery of significant resources is significant. Site disruption or "churning" have altered the contextual record on adjacent sites. However, in view of the potential significance of this resource, appropriate mitigation should be required.
31. Page 4.14.14 acknowledges that the Redondo Beach site has potential to yield historic resources but concludes that the impact is nonexistent due to lack of physical construction. This conclusion contradicts earlier statements in the document which conclude that physical construction is "likely" in order to separate the retained and divested properties and to accomplish repowering.
32. Page 4.15.10 should discuss the fact that the City has historically utilized once-through cooling water to heat a public swimming facility, the Seaside Lagoon". Due to damage from the Northridge Earthquake the supply structures are no longer serviceable. With the transition of the facility to private operation, the availability of heating and circulation water, to a public park facility is considered an impact.
33. Page 4.1.22 should correctly identify "Beryl Drive" as Beryl Street.

Thank you for the opportunity to provide you with this preliminary input at the start of the environmental review process. We are looking forward to providing further comments as the

process progresses. Please contact Aaron Jones at 310-318-0637 should you have any questions or need clarification.

Sincerely,

/s/

Aaron Jones

Economic Development Administrator

cc: Paul Connolly, City Manager

Jerry Goddard, City Attorney

Stan Remelmeyer, Assistant City Attorney

Steve Huang, City Engineer and Building Official

April 9, 1997

Julie Halligan
California Public Utilities Commission
c/o Environmental Science Associates
301 Brannan Street, Suite 200
San Francisco, California 94107

Dear Ms. Halligan:

The City of Redondo Beach is pleased to have the opportunity to provide comments and input regarding environmental impacts and other issues associated with the proposed divestiture of SCE's fossil fuel fired generating facilities in Southern California.

The Redondo Beach Generating Station is presently operated, and over the last 10 years has been operated as a load-following plant operating at approximately 30% of capacity. Assuming a prospective purchaser continues to utilize the site for electrical generation, it is logical to conclude that they will want to maximize their return on investment by maximizing power production from the facility. Such increased levels of operation have been shown to have significant environmental impacts which require mitigation. Analysis of these impacts was performed in the environmental review process for the proposed merger of Southern California Edison with San Diego Gas and Electric in 1990 and the proposed installation of Selective Catalytic Reduction (SCR) in 1992.

Any increase in operation of the facility is expected to result in significant impacts in the following areas: Noise, Fish Population, Air Emissions and Transportation and Storage of Hazardous Materials (particularly Aqueous Ammonia and Vanadium Pentoxide Catalyst).

The proposed divestment documents indicate that SCE desires to reparcelize the present 47 acre facility and retain ownership of transmission facilities, certain pipelines and fuel oil storage tank areas. The operation of a bulk fuel storage area is a separate use is not recognized as a permitted activity under local land use standards. Further, reparcelization results in an irregular subdivision pattern and raises significant concerns with respect to access, circulation, adequacy of streets, storm drains and other infrastructure. A full analysis of the effects of the physical land division should be required of each facility proposed for divestment.

The Redondo Beach General Plan and Harbor/Civic Center Specific Plan contain numerous primary and supplemental land use policies which mandate comprehensive planning for the reuse of the subject site for non-industrial use, in anticipation of the end of the economic and physical life of the plant. Units 1-4 were installed in 1948 and 1949 and are in long term shutdown. Unit 4 is occasionally operated to provide auxiliary plant steam. The age of the equipment, and the inefficient heat rate of these units have been stated to make these units uneconomical to operate. Units 4 and 8 began operation in 1967 and are moderately efficient when compared to new generation technologies.

For the above reasons, environmental analysis should consider two project alternatives; reuse of the subject property for non-industrial development and repowering of the facility with new modern and efficient equipment. Either scenario is reasonably foreseeable in view of the age of

the facilities. In the event that repowering is evaluated, detailed analysis and modeling with respect to noise, vibration and emissions should be conducted on a local level. In evaluating reuse, the potential development of the transmission corridors in conjunction with the plant site must be considered.

A full analysis of site contamination including soils and ground water remediation requirements should be incorporated into the environmental documents. The industrial use of the property since the late 1800's can be reasonably expected to have resulted in contamination. Contamination has been documented on adjacent porperties. The nature and extent of this contamination and the potential exposure of the public to health risks should be disclosed and analyzed.

Thank you for the opportunity to provide you with this preliminary input at the start of the environmental review process. We are looking forward to providing further comments as the process progresses. Please contact Aaron Jones at 310-318-0637 should you have any questions or need clarification.

Sincerely,

/s/

Paul Connolly
City Manager

/s/

Aaron Jones
Economic Development Administrator

cc: Jerry Goddard, City Attorney
Steve Huang, City Engineer and Building Official
Pat Aust, Fire Chief

CRB - CITY OF REDONDO BEACH

CRB-0.

The Initial Study systematically analyzed potential impacts from the proposed divestiture of each power plant on the environment. The Initial Study used the environmental checklist provided in the *CEQA Guidelines* Appendix I. All reasonably foreseeable effects of the divestiture were analyzed and where environmental effects were found to be potentially significant, mitigation measures were incorporated. It is noted that the City does not request that the CPUC determine that an EIR be required for the project.

CRB-1.

The Mitigated Negative Declaration/Initial Study was submitted to the State Clearinghouse on August 26, 1997 and received a schedule number of 97081067. The CPUC was notified on September 26, 1997 that this CEQA requirement has been met. With respect to notifying appropriate Councils of Government, as noted in the Mitigated Negative Declaration, the San Bernardino County Association of Governments, the South Bay Association of Governments, and the Los Angeles Regional County Planning Department were notified. Also, in addition to the parties listed on pages 6.4 through 6.13 of the Initial Study, every municipality within 10 miles of each power station was similarly notified, as were property owners and occupants within 300 feet of each power station. Through these contacts, the CEQA requirement mentioned by the commentor was satisfied.

CRB-2.

As mentioned in response to CRB-0, the environmental checklist provided in the *CEQA Guidelines*, Appendix I, was used in the Initial Study. Some of the four items (a-d) listed in CRB-2 are described in detail in other subsequent comments provided by the City as follows:

a. Conflict with adopted environmental plans and goals. This comment is addressed in response to CRB-9.

b. Fuel and Water. Fuel usage was discussed on page 4.8.2 of the Initial Study: “Divestiture does not conflict with any adopted energy conservation plans. Therefore, this would be a less-than-significant impact.” Also on page 4.8.3, the Initial Study concluded, “The increased use of energy resources that could result from divestiture is likely to be less wasteful or inefficient. This impact is less than significant.”

Water usage was discussed on 4.4.46 of the Initial Study: “The project would not substantially affect surface water quantity at either the coastal or inland plants, or regionally. Therefore, the project impact would be less than significant.” On page 4.4.47 the Initial Study states, “The project could result in additional groundwater extractions from the Upper Santa Ana River and Lower Mojave River basins. However, these extractions would be required by water rights judgments to be replaced by imported surface waters. Therefore, no significant impact would be expected.” Also, on page 4.4.49 the Initial Study states, “The project could require additional groundwater extractions from the Upper Santa Ana River and Lower Mojave River basins. These extractions could affect groundwater quality and water levels in the basin but would be offset by imported water as stipulated in water rights judgments. No significant impacts are anticipated.”

c. Noise levels. This comment is addressed in response to CRB-11 below.

d. Hazards. This comment is addressed in response to CRB-11 below.

CRB-3.

The comment refers to mitigation measure 4.14.a.1, which applies only to the Cool Water power plant. Please see revisions to mitigation measure 4.14.a.1 in Section IV of this report, Text Changes.

CRB-4.

Please see response to CCC-2. Note that the costs of remediation are not relevant to CEQA environmental analysis. Such costs are being considered by the CPUC in its Edison divestiture proceeding (A.96-11-046).

CRB-5.

As indicated on page 4.9.13 of the Initial Study, the Phase I and Phase II reports were completed for the Redondo Power Plant. Information in these reports was used and factored into the Mitigated Negative Declaration/Initial Study. The commentor indicates that “elsewhere in the document” the document contradicts text on 4.9.13. We are unable to locate such text within the Initial Study.

CRB-6.

To reflect the City's information, on page 2.8 (Section 2) of the Initial Study, the third sentence of the first full paragraph is revised as follows:

At Redondo, Edison will either sell the entire property, retaining easements and the transmission facilities, if the lot line adjustment is not approved prior to the auction, or if approved, divide the property as proposed in the lot line adjustment application.

CRB-7.

To reflect the City's clarification, the last sentence of paragraph 2, page 4.1.7 is revised as follows:

Although the generation plant falls within the City's Coastal Zone, the Harbor/Civic Center Specific Plan serves as the area's local coastal plan. The project site is within the California Coastal Commission's Coastal Zone. The City does not have a fully certified Local Coastal Plan; therefore, the Coastal Commission retains permitting authority for land use changes at the plant.

CRB-8.

Public Utilities Code Section 377 removes much of the CPUC's regulatory authority over utility generation plants after these plants are market valued—an event mandated by AB 1890 even if divestiture does not occur. While it is true that local agencies would be the “lead agencies” for CEQA review of most future site improvements, most of the “permitting activities related to site planning, site improvements, building construction, and hazardous materials handling” are already handled by agencies other than the CPUC. Thus, divestiture would not have a significant impact on the economics of local permitting agencies. Rather than shifting regulatory authority, removing the CPUC from the regulatory regime over power plants merely gives way to the extensive existing regulatory authority of other federal, state and local agencies with permitting authority, such as the California Energy Commission, the California Department of Toxic Substances Control, and the Air Pollution Control Districts.

CRB-9.

Edison intends to continue pursuing partitioning of the property. As noted on page 4.1.17, the sale of the property would not involve a substantial adverse change in physical conditions, either directly or indirectly, and no substantial land use or zoning conflicts would occur. While it is possible that the City of Redondo Beach Planning Commission and City Council could determine that the newly-created parcel would be inconsistent with the General Plan or zoning designation, it appears that the continued use of the land for fuel oil storage would be consistent with the P-GP use designation.

CRB-10.

No new studies or analyses were performed after the issuance of the Draft Initial Study. As sought by the CPUC in offering the Draft Initial Study for review, the CPUC received many

written comments about the electrical system operation after divestiture. Refinement and clarification of the CPUC's assessment (in part based on these comments) was presented in Section 3 of the completed Initial Study.

CRB-11.

There is a great deal of uncertainty in the new energy market that makes it speculative to predict the specific increase in generation at any one divested plant (see pages 3.3 - 3.6 of Initial Study). Furthermore, the project analysis has indicated that divestiture would result in only a tendency for the new owners to operate more and not that the plants would operate at maximum capacity. The Initial Study and the evidence in the record, do not support the commentator's statement that "Any increase in operation will result in significant, quantifiable environmental effects" and that significant impacts would occur on noise, fish populations, air emissions, and hazardous materials as a result of implementation of the project. The EIR for the merger of Southern California Edison and San Diego Gas and Electric was reviewed and its analyses considered, during the preparation of the Initial Study for this project. However, an independent analysis was conducted for the proposed divestiture which made the following conclusions (summarized from the Initial Study):

Noise. Increased operations could result in relatively small noise level increases at some locations; these would not be significant. The frequency of automatic relief valves activating may increase with increased operation, but it would not be a constant occurrence and would not be anticipated to expose sensitive receptors to severe noise levels (see Section 4.10 of the Initial Study).

Fish Populations. No substantial changes are anticipated in cooling water intake and discharge levels and all plants would be required to continue to operate under permit conditions established by the Regional Water Quality Control Board. Minor changes in intake volumes and discharge quantity and quality may occur within permit conditions, which may have minor effects on fisheries but would not be considered significant (see Section 4.7 of the Initial Study).

Air Emissions. For the Redondo Plant, any increases in NO_x emissions would be offset by the South Coast Air Quality Management District's RECLAIM policy (see Section 4.5 of the Initial Study).

Transportation and Storage of Hazardous Materials. Increases in plant operation could increase the use and generation of hazardous materials. However, new owners would be required to comply with all worker and public safety laws and regulations and hazardous materials regulatory requirements. The project would not substantially affect emergency response or evacuation plans. The impacts are not anticipated to be significant (see Section 4.9 of the Initial Study).

CRB-12.

The Initial Study does address the effects of land division for each facility proposed to be divested that involves parcelization. Edison desires to retain portions of the Redondo Beach property and divest other portions, as shown in Figure 2.25 of the Initial Study. Edison has submitted a lot line adjustment application and apparently wishes to continue pursuing partitioning of the property. Should the lot line adjustment not be approved before the auction, Edison proposes to retain certain parcels that are currently legal lots and require no lot line adjustment (see response to E-9, which presents a new map submitted by Edison subsequent to publishing the Initial Study showing legal parcels to be retained in the event the lot line adjustment is not approved prior to the auction).

As noted on page 4.6.4 of the Initial Study, current conditions for access and traffic circulation would not change because Edison would require as part of the conditions of the sale agreement that the new owner of divested properties allow access to Edison, and Edison would allow access through its retained properties to new owners of divested facilities. Similarly, public infrastructure needs would not change because of the reparcelization, since the uses on the properties would remain the same. Please see response to CRB-9 with respect to General Plan and zoning consistency.

CRB-13.

No alternatives to the project were considered because the CPUC determined there are no significant impacts that cannot be mitigated to less-than-significant levels. In general, lead agencies must consider alternatives to the project only when an Environmental Impact Report is conducted. As noted in the Initial Study, the CPUC assumed in its CEQA review that: the divested plants will continue to operate, within the parameters of their existing permits (page 3.5); the incentives to retire or repower a given plant would be the same whether it is owned by Edison or a new owner (page C.16); and a decision by the new owner to repower the facility would trigger a “new source review” at the applicable air quality agencies, as well as a permitting process at the California Energy Commission if the repowering would increase capacity at the plant by more than 49 megawatts (MW) (page 3.2), and/or possibly approval by local permitting bodies. As discussed in Attachment C, Section 3.4 on page C.16 of the Initial Study, the decision to repower a generation facility is unlikely to be affected by divestiture over the next decade. Even though the existing owners and new owners may see different incentives and constraints on their actions in the restructured industry, these are not sufficient to create substantially different incentives for repowering these plants during that period.

To provide further clarification concerning the possible impacts of future repowering, the sixth sentence of the first paragraph of page 3.2 is revised as follows:

With that exception, however, expansion or repowering of facilities at the plants would require issuance of new permits and accompanying environmental review by the CEC. Regardless of CEC jurisdiction any plant expansion would require other permits and environmental reviews such as new construction permits or new source review by the affected air agencies.

In reference to noise, see response to CRB-11.

CRB-14.

Please see response to CRB-13.

CRB-15.

Comment noted.

CRB-16.

Table 4.16-1 is amended to include the following additional local community projects near the Redondo Beach Generating Station. These projects were identified in the City's comments and in a telephone conversation between Aaron Jones of the City and Richard Masters of ESA on October 7, 1997.

<u>811-819 North Catalina Avenue</u>	<u>Catalina Technology Center, 293,000 sq. ft mixed use immediately east of the plant. Includes 20,000 sq. ft of Retail/Commercial, 40,000 Business Office, 40,000 Incubator, Industrial, and 100,000 mini storage, due to start construction November, 1997</u>
<u>East of Edison plant, across Gertruda Street</u>	<u>Condorian Theater Project; 50,000 sq. ft, 13-16 screens, 2,500-3,000 seat cinema with 15,000 sq. ft of retail/restaurant</u>
<u>260 Portofino Way</u>	<u>Portofino Hotel, addition of conference and banquette rooms</u>
<u>300 N. Harbor Drive</u>	<u>Crown Plaza Hotel, 21 room expansion</u>

The analyses and conclusions of cumulative impacts with local community projects described on pages 4.16.12 through 4.16.15 remain unchanged.

CRB-17.

The third sentence of the first paragraph on page 4.9.6 is revised as follows:

Redondo power plant has a hazardous waste storage area, six aboveground storage tanks, one underground aqueous ammonia storage tank, two underground storage tanks, (one containing unleaded gasoline, and the other containing diesel fuel), one resin tank, three retention basins, one transformer switch yards, and eight generating units that could be sources of contamination.

CRB-18.

Although there is no significant impact requiring mitigation, Edison has agreed to incorporate the suggested measure into the project. Therefore, the next to last paragraph on page 4.9.7 of the Initial Study is revised as follows:

~~Edison has agreed to provide any new owners with all of Edison's informational materials and training documents related to worker health and safety and to hazardous materials handling and storage.~~

Although the impact is not significant, the following mitigation measure will reduce any potential accidental risks to even lower levels:

Mitigation Measure

4.9.a.1 For the plants subject to this proceeding Edison shall provide the new owner, for each respective plant, with all of Edison's material, non-privileged informational materials and training documents (not including records relating to Edison personnel) regarding worker health and safety, emergency plans and hazardous materials handling and storage. Although the new owners will be responsible for ensuring that their operations are in compliance with applicable laws, this informational material may assist new owners in understanding worker health and safety issues and procedures and in meeting all safety and legal obligations regarding hazardous materials handling, emergency plans and storage.

Monitoring Action: Edison will provide the CPUC mitigation monitor with a disclosure form signed by the new owner listing documents to accomplish this condition

Responsibility: CPUC

Timing: At least 3 business days prior to transfer of title of the plant(s).

Mitigation measure 4.9.a.1 is also added to the Mitigated Negative Declaration.

The last paragraph on page 4.9.7 is revised as follows:

Under divestiture, any new owner would be required to comply with all worker and public safety laws and regulations, just as is the case for Edison now. Furthermore, Edison will provide each new owner with information about Edison's operating procedures and compliance plans. Because of these laws and circumstances, this potential impact of the project would be less than significant. Nonetheless, the above mitigation measure will assist new owners in complying with pertinent laws and regulations.

CRB-19.

As noted on page 4.6.4 of the Initial Study, there would be no change from current conditions for access because Edison would require as part of the conditions of the sale agreement that the new owner of divested properties allow access to Edison, and Edison would allow access through its retained properties to new owners of divested facilities. As noted on page 4.9.8, the emergency response plan will need to be updated by the new owners and the update would logically note the access situation. These conditions are part of the project, so a mitigation measure is not needed.

CRB-20.

The referenced sentence on page 4.10.3 was intended to be a general statement of the approximate impact area/distance for consistency with ordinance standards and community response. At specific locations, the plant generated sound level is dependent on various factors including the noise spectrum, the terrain and intervening buildings (if any) and the weather conditions. The community response is dependent on the noise level, noise character, background noise, type of receptor, community history and individual sensitivities.

CRB-21.

Concerning the location of Pacific Coast Highway with respect to the Redondo Generating Station and receptors, reference to a city map and the site plan indicate that the highway is approximately 0.15 miles from the plant. Sensitive receptors in the area include residential buildings on North Elena (Robey, 1997); this roadway is approximately 0.025 to 0.2 miles from the Pacific Coast Highway. The highway is 0.35 miles from the sound measurement location at the residential facility on Herondo Street at Monterey Boulevard. Moreover, highway noise is generally audible over a fairly wide corridor. Please refer to the response to CRB-20.

It is true that noise complaints can occur to receptors farther than 0.5 miles from stationary noise sources, however the Redondo Beach power plant is not currently generating complaints from

such distances and the divestiture of the plant would not reasonably be expected to change operations to the degree to generate noise complaints from such distances.

CRB-22.

The wall referred to (discussed in the first paragraph on Page 4.10.9) is approximately 10 feet tall, based on inspection and on information provided by Paul S. Veneklasen & Associates, a consultant to Edison that conducted surveys of the Redondo plant and the surrounding community (Robey, 1997). This particular wall is along Herondo Street and is across the street from the multifamily complex where the sound measurement was made.

CRB-23.

This measurement was taken along Herondo Street at Monterey Boulevard. The location was selected as being the nearest evident sensitive receptor, which was multifamily development, to the plant. As noted in the comment, the measurement location was in Hermosa Beach.

The City of Hermosa Beach noise ordinance specifies a maximum level for steady noise at multifamily land use of 55 dBA for daytime and 50 dBA for nighttime, with adjustments for noise character as judged by the enforcing officer and also adjustment for background noise. The measured sound level obtained from the sample taken along Herondo Street appeared to be in compliance with local noise standards.

CRB-24.

As noted in the first paragraph on page 4.10.10 of the Initial Study, there is no documentation that the facility is not in compliance with the noise ordinance and no evidence to suggest that any current background noise levels above noise ordinance standards are attributable to the power plant. In any event, given that a trial court has ruled that the noise ordinance is too difficult to interpret and enforce, a determination of compliance may not be an appropriate measure of the project's noise effects. Comprehensive acoustic analyses have been done for the Redondo Beach power plant. Study reports include in part: a Wyle Laboratories report of March, 1991; and a report by Paul S. Veneklasen & Associates of November 12, 1996. Neither a review of these reports nor the current noise study conducted as part of the Initial Study (second paragraph, page 4.10.10) indicate ongoing community noise effects from the power plant.

As reported by Khosrovani (1996), Edison has agreed to maintain the noise levels on the property line of the plant to a level of 64 dBA or below (see page 4.10.9 of the Initial Study). This level thus serves as a baseline and reference value to evaluate the effect of noise control methods applied. Edison has applied a number of methods to achieve this noise level on the property lines of the site. These methods include active noise suppression systems for inlets of

Forced Draft fans of units 7 and 8 and noise control enclosures around the fan housings, equipment enclosures, barriers, valve change-out and pipe lagging systems. These noise reduction techniques have reduced the noise levels from 72 dBA to 63 dBA at the existing east fence lines of the site which is the most sensitive of all segments of the fence lines. This would generally be considered to represent a reduction in loudness of nearly 50 percent.

It appears from the information provided that appropriate and “best available” methods have been applied to control the Redondo Beach plant noise. Information received related to this issue indicates that the plant is currently in compliance with the “informal” standard of 64 dBA at the east property line (George, 1997).

CRB-25.

As described on page 4.11.6, it is not known if the new owner would or would not provide security services. Also, as described in the Initial Study, it is anticipated that if no private security were provided, any demand for police services would be low and that no significant impact would occur. There is no basis to conclude otherwise. In any event, even if the facility has private security services, the services of police can still be required at times and the local police are still responsible for serving the site.

CRB-26.

With or without divestiture, it is possible that the plant would generate more electricity and more employees could be added to the plant. Although identifying a specific number of new employees would be speculative, the growth in wastewater flows from the additional sewage generated by a few new employees, if any, would be unnoticeable to the wastewater collection system. Since the project itself would not generate incremental impacts to the system, it would not have cumulative effects when considered in light of the other projects mentioned by the commentor.

CRB-27.

With the exception of adding fences to proposed parcel boundaries internal to the plant, the proposed project will add no new structures and will not change any views. The following information is added to the end of the last paragraph on page 4.13.6 of the Initial Study:

In views from the east, the site is visually compatible with surrounding industrial uses. The station facilities and transmission lines dominate the background of southwesterly views from uphill areas along Herondo Street. The City of Redondo Beach has noted that nearly all of the industrial uses to the east of the plant will be redeveloped. The City considers the view of the plant to be incompatible with the community and destructive to the scenic vista of the harbor. However, with the exception of fences to proposed parcel

boundaries internal to the plant, the proposed project will add no new structures and will not change any views. Therefore, the project will generate no significant visual impacts.

As discussed in Section 3 of the Initial Study, the continued existence of the Redondo plant, as with all other Edison plants being offered for divestiture, is dependent on market forces that are independent of divestiture. Either Edison or the new owners would have similar incentives to continue operations, refurbish or repower these plants. (See also responses to CCC-1, CCC-2, and CRB-13.)

CRB-28.

The past use of cooling water to heat the City's public swimming pool is noted on page 4.15.17. Such use was discontinued in 1994 because of damage caused by the Northridge earthquake. Accordingly, the document states that, "It is not known what the availability of this resource would be to the City with a new owner of the plant."

REFERENCES:

George, Ballard, Acoustic Engineer, phone interview, October, 13, 1997.

Khosrovani, Hooshang, Paul S. Veneklasen & Associates, "Noise Impact Report-Redondo Generating Station," 12 November 1996.

Robey, Bob, Paul S. Veneklasen & Associates, personal communication, August 13, 1997.