

Responses to Comments

**on the Amendment to the
Water Quality Control Policy on the
Use of Coastal and Estuarine
Waters for Power Plant Cooling**

**to Revise Compliance Schedules
for Alamitos, Huntington Beach,
Ormond Beach, and Redondo
Beach Generating Stations and
Diablo Canyon Nuclear Power Plant**

August 18, 2020

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Abbreviations and Acronyms

Abbreviation or Acronym	Full Name or Phrase
2010 Final SED	Final Substitute Environmental Document for the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling
AES	AES-Southland, Inc.
Alamitos	Alamitos Generating Station
AQI	Air Quality Index
August 2019 SACCWIS Report	<i>Report of the SACCWIS on Local and System-Wide 2021 Grid Reliability Studies</i>
BAA	Balancing Authority Area
BTA	Best Technology Available
CAISO	California Independent System Operator
CARB	California Air Resources Board
CCGT	Combined-Cycle Gas Turbines
CDP	Coastal Development Permit
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CNRA	California Natural Resources Agency
CO ₂	Carbon Dioxide
Coastal Commission	California Coastal Commission
Conservancy	State Coastal Conservancy
Covenant	Open Space Covenant and Option Offer Agreement
CPUC	California Public Utilities Commission
CWA	Clean Water Act
Diablo Canyon	Diablo Canyon Nuclear Power Plant
Amendment	Amendment to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling
ELCC	Effective Load Carrying Capacity
EIFD	Enhanced Infrastructure Financing District
EIR	Environmental Impact Report
ERP II	Expert Review Panel
GenOn	GenOn – NRG California South LP
Huntington Beach	Huntington Beach Generating Station
IRP	Independent Review Panel

Abbreviation or Acronym	Full Name or Phrase
January 2020 SACCWIS Report	Recommended Compliance Date Extensions for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations
LCP	Local Coastal Program
LSE's	Load Serving Entities
March 2019 SACCWIS Report	March 2019 Annual SACCWIS Report
May 2020 Joint Energy Agency Letter	Extension of Once-Through Cooling Policy Compliance Dates – May 27, 2020 Joint Letter from the CAISO, CEC, and CPUC
MIC	Maximum Import Capacity
MGD	Million gallons Per Day
MPA	Marine Protected Area
MW	Megawatt
MBARD	Monterey Bay Air Resources District
NO ₂	Nitrogen Dioxide
NOV	Notice of Violation
NO _x	Nitrogen Oxide(s)
NQC	Net Qualifying Capacity
NTC	Notice to Comply
NPDES	National Pollution Discharge Elimination System
NRC	United States Nuclear Regulatory Commission
OPC	Ocean Protection Council
Ormond Beach	Ormond Beach Generating Station
OTC	Once-Through Cooling
OTC Policy	Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling
PG&E	Pacific Gas and Electric Company
RA	Resource Adequacy
Redondo Beach	Redondo Beach Generating Station
Regional Water Board	Regional Water Quality Control Board
SACCWIS	Statewide Advisory Committee on Cooling Water Intake Structures
SED	Substitute Environmental Document
SIP	State Implementation Plan
SLH	SLH Fund, LLC
SCAQMD	South Coast Air Quality Management District

Abbreviation or Acronym	Full Name or Phrase
Staff Report	Staff Report for the Amendment to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling to Revise Compliance Schedules for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations and Diablo Canyon Nuclear Power Plant
State Water Board	State Water Resources Control Board
TAC	Toxic Air Contaminant
TPD	Tons Per Day
TSO	Time Schedule Order
VCAPCD	Ventura County Air Pollution Control District

1. Introduction

The State Water Resources Control Board (“State Water Board”) received over 747 written comments on the *Amendment to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling* (Once-Through Cooling or “OTC Policy”) and the *Draft Staff Report for the Amendment to the OTC Policy to Revise the Compliance Schedules of Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations and Diablo Canyon Nuclear Power Plant* (“Amendment” and “Staff Report,” respectively). The public comment period for the Amendment and Staff Report started on March 18, 2020, and closed at noon on May 18, 2020. This document (“Response to Comments”) contains responses to the comment letters submitted to the State Water Board on the Amendment and Staff Report. Based on these comments, the Staff Report and Amendment have been revised as needed.

This document is provided in order to respond to the numerous comments received during the public comment period. Additional information provided in these responses, to the extent that it is material to the Board’s decisions regarding compliance date extensions and the requirements for grid reliability, is based upon and supplements data and findings previously set forth within the Statewide Advisory Committee on Cooling Water Intake Structure’s (“SACCWIS”) *Final Recommended Compliance Date Extensions for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations Report* (“January 2020 SACCWIS Report”), which recommended compliance date extensions for the purposes of grid reliability. This document, together with revisions to the Staff Report, provides supplemental context on the electrical grid and energy use, including subsequent energy agency decisions and recommendations, as well as detail on other regulatory issues raised in comments, including air quality and wetlands regulation. The information provided in these revisions and responses, which also describes other agency programs and reports, is intended as background information for stakeholders in order to better understand the issues before the SACCWIS member agencies as they advise the State Water Board on extending compliance dates for once-through cooling (“OTC”) facilities.

The responses to comments and revisions to the Staff Report do not add significant new information that is material to the State Water Board’s decision or that would otherwise warrant action that is not a logical outgrowth of the proposed amendment that was previously subject to a written comment period. Therefore, it is not necessary to afford interested persons with another written comment period to address the responses to comments or revisions to the Staff Report.

Comment letters were assigned an identifying number (001 through 747) as they were processed by the State Water Board. The attached Table 1 – Index of Commenters provides an alphabetical list of the commenters with the identifying numbers. Readers should use this table to identify the letter number or numbers associated with their submissions and then find the identifying number to view comments and responses in the attached Response to Comments tables. Due to the large volume of comment letters received, responses to comment letters were organized into nine Response to Comments tables attached to this document as follows:

- Table 2 – Comment Letters 001-038
- Table 3 – Comment Letters 039-099
- Table 4 – Comment Letters 100-199
- Table 5 – Comment Letters 200-299
- Table 6 – Comment Letters 300-399
- Table 7 – Comment Letters 400-499
- Table 8 – Comment Letters 500-599
- Table 9 – Comment Letters 600-699
- Table 10 – Comment Letters 700-747

Water Board staff did not edit any comments for spelling, grammar, or clarity. All writings in the comment field of these tables are the true and accurate representation of the comment provided to the State Water Board.

Many of the received comments were similar in nature or could be grouped within distinct categories. In order to facilitate responding to the comments received, master responses address comments within the following categories: comments on the proposed extension of Redondo Beach Generating Station (“Redondo Beach”); grid reliability and how the fossil-fueled OTC units are typically operated; water quality, impacts to marine life and mitigation; wetlands; air quality; and requirements of the California Environmental Quality Act (“CEQA”). If a master response is referenced in the “Response” column for a given comment in tables 2 through 10, the response to that comment is found within the identified master response in Section 2. Should a discrepancy be found in unique responses to comments, readers should defer to the master responses.

2. Master Responses

2.1. Comments on the Proposed Extension of Redondo Beach

This master response addresses comments regarding requirements of the OTC Policy and general opposition to or support for an extension of the OTC Policy compliance date for Redondo Beach for up to three years to December 31, 2023.

Additionally, this master response addresses comments on the *Open Space Covenant and Option Offer Agreement* (“Covenant”) between AES Southland, Inc. (“AES”), the operator of Redondo Beach, and SLH Fund, LLC, (“SLH”) (formerly New Century Power) the new owner of the property Redondo Beach is located on.

Commenters often included introductory information about the commenter’s agency or organizations’ mission, background information, or the importance of the Amendment to the agency or organization. Multiple commenters provided a variety of personal and professional background information in their letters. These statements provide context in understanding the comments of a particular commenter that are germane to the Amendment and the Staff Report; however, this type of information does not raise significant environmental issues or make comments on the Amendment and does not require a response.

Multiple commenters listed a variety of other reasons for opposing any extension of Redondo Beach. Comments stating that Redondo Beach is not needed for grid reliability are responded to in detail in Master Response 2.2, Grid Reliability.

Further comments were received expressing concerns about the negative impacts of Redondo Beach's operation on water quality in the Santa Monica Bay; protecting and having more of the coastline available; acquiring and restoring historical wetlands on the Redondo Beach property, potential delays to restoring onsite wetlands and redeveloping the property into greenspace or other non-industrial use; concerns about the availability of funding to the City of Redondo Beach for remediation and restoration; and concerns that remediation will take a lot of time and funding. Comments regarding impacts to bay and ocean water quality and impacts to marine life due to current and continued operation of OTC facilities are responded to in detail in Master Response 2.3, Water Quality, Impacts to Marine Life and Mitigation below. Comments regarding the onsite wetlands on the Redondo Beach property are responded to in detail in Master Response 2.4, Wetlands. Comments relating to concerns about impacts to air quality (such as smoke or odors from the facility, contribution to regional greenhouse gas emissions, and Redondo Beach's overall permit compliance) and health of the surrounding community with respect to the proposed compliance date extensions are responded to in detail below in Master Response 2.5, Air Quality.

Additionally, many comments assume that the State Water Board must analyze the environmental impacts associated with continued operations of any power plant pursuant to CEQA as part of approving a revision to the compliance dates. Comments regarding CEQA are addressed in Master Response 2.6.

2.1.1. Requirements of the OTC Policy

A substantial number of commenters made general statements that inaccurately interpreted the purpose or requirements of the OTC Policy or the jurisdiction and authority of the State Water Board. Several comments stated that a promise was made that Redondo Beach would shut down at the end of 2020 and any extension of the compliance date and continued operations at this facility would be breaking this promise. Additionally, several comments stated that operational OTC units, or OTC units not complying via Track 2 are currently in violation of the OTC Policy, or will be in violation if the compliance dates are extended.

The OTC Policy does not require affected power plants to shut down on or before their compliance dates. The OTC Policy establishes requirements for the implementation of Clean Water Act ("CWA") section 316(b), using best professional judgement in determining the best technology available ("BTA") for cooling water intake structures at existing coastal and estuarine power plants to reduce impingement and entrainment impacts to marine life. However, it is the State Water Board's responsibility to implement the OTC Policy while ensuring the implementation schedule (also known as the compliance schedule) considers local area and system-wide grid reliability and permitting constraints.

It is necessary to develop replacement infrastructure to maintain electric reliability in order to implement the OTC Policy, which acknowledges that the compliance dates in

the OTC Policy may require amendment based on, among other factors, the need to maintain reliability of the electric system as determined by the SACCWIS, acting according to their individual or shared responsibilities. See, OTC Policy section 1.I. Furthermore, in accordance with Section 3.B.(5) of the OTC Policy, in the event that the SACCWIS energy agencies make a unanimous recommendation for a compliance schedule modification based on grid reliability, the State Water Board shall afford significant weight to the recommendation. A more detailed description of the SACCWIS and its advisory role to the State Water Board to ensure that implementation of the OTC Policy does not disrupt the electric reliability of the State is included in Master Response 2.2, Grid Reliability.

“Compliance” with the OTC Policy does not equate to the retirement of OTC units covered under the OTC Policy. The OTC Policy requires a reduction of intake flow rate at each OTC unit, at a minimum, to a level equivalent with that which can be attained by a closed-cycle wet cooling system, which was analyzed as a means of compliance in the 2010 Final Substitute Environmental Document (“2010 Final SED”) for the OTC Policy. A minimum 93 percent reduction in intake flow rate for each OTC unit is required for Track 1 compliance, compared to the unit’s design intake flow rate, along with reducing the through-screen intake velocity below 0.5 foot per second. If an owner or operator of a power plant demonstrates that compliance with Track 1 is not feasible, the owner or operator may comply with the OTC Policy via Track 2 compliance.

Track 2 requires a reduction in impingement mortality and entrainment of marine life for the facility, on a unit-by-unit basis, to a comparable level to that which would be achieved under Track 1, using operational or structural controls, or both. A “comparable level” of reduction is a level that achieves at least 90 percent of the reduction in impingement mortality required under Track 1, which equates to an overall 83.7 percent or greater reduction in impingement mortality and entrainment by each OTC unit. The owner or operator of a facility decides the measures for compliance with the OTC Policy on a unit-by-unit basis.

Retirement of an OTC unit is an option that may be selected in order to comply under Track 1, as retirement acts to achieve a 93 percent or greater reduction in intake flow rate and less than 0.5 foot per second through-screen velocity. The OTC Policy and the 2010 Final SED were not meant to analyze or otherwise determine how long the facilities would operate. See Master Response 2.6 for more information on compliance measures and CEQA analysis for the OTC Policy.

The OTC Policy does not prohibit the use of cooling water intake structures. As described above, compliance with the OTC Policy does not require shutting down existing OTC units. It requires significant reductions to intake flow rate and through-screen velocity of screens covering the cooling water intake structures. These reductions can be in achieved multiple ways, making modifications to or installing new operational or structural controls, a different type of cooling system such as closed-cycle wet or dry cooling, or cessation of operation. It has been the responsibility of the owners and operators of the OTC units to determine how they will comply with the OTC Policy, proposing an implementation plan as stated below. (Policy section 3.A.)

Other comments stated that operational OTC units, or OTC units not complying via Track 2 are currently in violation of the OTC Policy, or will be in violation if the compliance dates are extended. The OTC Policy required owners or operators to submit an implementation plan to the State Water Board no later than April 1, 2011, identifying the compliance alternative selected by the owner or operator, describing the general design, construction, or operation measures that will be undertaken to implement the alternative, and propose a realistic schedule for implementing these measures that is as short as possible. If the owner or operator chooses to repower the facility to reduce or eliminate reliance upon OTC, or to retrofit the facility to implement either Track 1 or Track 2 alternatives, the implementation plan shall identify the time period when generating power is infeasible and describe measures taken to coordinate this activity through the appropriate electrical system balancing authority's maintenance scheduling process. Moss Landing Power Plant is the only facility that is complying with the OTC Policy through Track 2.

Furthermore, the OTC Policy empaneled the SACCWIS for the purpose of reviewing implementation plans and schedules submitted by the owners and operators pursuant to the OTC Policy. The SACCWIS advises the State Water Board on the implementation of the OTC Policy at least annually to ensure that implementation schedules consider local area and grid reliability, including permitting constraints. For more information about the SACCWIS process, please see Master Response 2.2.

Furthermore, the OTC Policy required owners and operators of existing power plants to fulfill immediate and interim mitigation requirements. Immediate requirements consisted of owners and operators installing large organism exclusion devices, with no greater than 9-inch gaps, over offshore intakes, and cessation of intake flows for any OTC units that were not directly engaging in power-generating activities or critical system maintenance. Additionally, the owner or operator of an existing power plant must implement measures to mitigate the interim impingement and entrainment impacts resulting from the cooling water intake structure(s), commencing October 1, 2015, and continuing up to and until the owner or operator achieves final compliance.

Final compliance for each OTC unit is different, determined by the track selected by the owner and operator. Since the adoption of the OTC Policy, ten of these facilities have permanently ceased their OTC operations by replacing, retiring, or repowering the OTC units. Eight of the remaining facilities complying via Track 1 plan to retire their existing OTC equipment. Dynegy's Moss Landing Power Plant is the only facility complying with the OTC Policy through Track 2. To date, owners and operators of existing OTC units have fulfilled, and continue to fulfill the requirements of the OTC Policy described above and are considered to be complying with the OTC Policy.

Additionally, the compliance dates do not preclude facilities from retiring earlier if their capacity is deemed unnecessary by the energy agencies of the SACCWIS.

2.1.2. General Comments on Opposition to Extension of Redondo Beach

A substantial number of commenters expressed general opposition to extending the OTC Policy compliance date for Redondo Beach beyond December 31, 2020. Reasons for opposing an extension include, but are not limited to: impacts to public health from

facility emissions such as particulate matter and greenhouse gases, including asthma, cancer, and other impacts that could affect the densely populated community surrounding the facility (21,000 people within a 1-square mile radius, including several schools and an elderly living facility); loud noises; poor aesthetics; that the plant is an eyesore; construction of new residential buildings near the facility; a desire for timely demolition of the facility to make way for parkland; desire to clean up the coastline; concerns for the extension of Redondo Beach negatively impacting tourism and property values; asserting that adoption of the amendment will delay Southern California Edison's removal of powerlines and conversion of the right-of-way to green space; and concerns that extension could lead to financial impacts to residents due to increased energy rates.

The State Water Board recognizes the controversial nature of extending OTC Policy compliance dates for certain facilities and the concerns of communities located near power plants. The State Water Board has the discretion to and, to the extent practicable, will consider these issues. However, the State Water Board's primary responsibility and jurisdiction is to implement CWA section 316(b) and ensure the beneficial uses of the state's coastal and estuarine waters are protected, while also ensuring that the electrical power needs essential for the welfare of the citizens of the state are met.

The 2010 Final SED established baseline environmental impacts caused by the operation of OTC facilities prior to adoption of the OTC Policy in 2010. As described in the 2010 Final SED, the OTC facilities do cause environmental issues, including impacts to marine life, water quality, air quality, and compounding effects when operating in proximity to other industrial processes that have a negative impact on the environment. All facilities subject to the OTC Policy are required to comply with applicable regulations as well as state and local permits that are designed to minimize environmental impacts and be protective of human health. If the compliance dates are extended, these OTC facilities would continue to be regulated by applicable air and water quality permits, therefore continuing to implement laws and regulations adopted in order to minimize environmental impacts and be protective of human health. Please see Master Response Sections 2.3 and 2.5 for detailed discussion of these applicable air and water quality permits.

As described in Section 1.1 of the OTC Policy, the State Water Board recognizes the compliance dates in the OTC Policy may require amendment based on, among other factors, the need to maintain reliability of the electric system as determined by the energy agencies included in the SACCWIS, acting according to their individual or shared responsibilities. The State Water Board relies on the recommendations of the SACCWIS to ensure that implementation of the OTC Policy does not impact the State's essential electrical power needs; however, the State Water Board retains the final authority over changes to the OTC Policy. The State Water Board may consider non-marine impacts to local communities, including air quality, environmental justice, or local land-use concerns as part of evaluating revisions to OTC Policy compliance dates; however, these issues are largely beyond the scope of the State Water Board's authority under CWA section 316(b) and the OTC Policy.

The Amendment is based on the recommendation of the SACCWIS, which was informed by the California Public Utility Commission's ("CPUC") proceedings, to avoid forecasted shortfalls in energy supplies starting in 2021 and annual and limited local technical analyses conducted by the California Independent System Operator ("CAISO"). Both of these entities serve as members of the SACCWIS. The Amendment fulfills the State Water Board's responsibility to ensure the protection of beneficial uses of the State and ensuring that the energy needs essential to the welfare of citizens of the State are met.

Regarding concerns about financial increases to ratepayers, as stated in the CPUC's November 2019 Decision (D.)19-11-016 recommending the extensions for Alamitos Generating Station ("Alamitos"), Redondo Beach, Huntington Beach Generating Station ("Huntington Beach"), and Ormond Beach Generating Station ("Ormond Beach"), these extensions are part of a "least regrets" strategy to minimize the risk of an electrical shortage, which is consistent with the CPUC's responsibility to ensure safe and reliable electric service. The CPUC must determine the difficult balance of having too few system resources, which could lead to actual energy shortages or and/or market manipulation opportunities for owners of system resources (leads to risk of additional ratepayer costs) versus having too much system resources, which also could lead to unnecessary ratepayer costs. Therefore, the SACCWIS, informed by the CPUC and the CAISO's analysis, fulfills its responsibility under the OTC Policy by recommending extensions to the compliance dates of the four fossil-fueled OTC facilities mentioned above to bridge the gap of the projected electrical shortfall while new procurement comes online to ensure grid reliability through 2023. Grid reliability and the role of the SACCWIS are further discussed below in Master Response 2.2.

2.1.3. AES and SLH Covenant for Community Benefits

Several comments described concerns about the community benefits in the Covenant presented by AES and SLH. Some stated that AES' offer of \$14 million towards clean-up costs of the Redondo Beach property in the event of a three-year extension of Redondo Beach should not be taken into consideration because remediation is required by law, and therefore they would already be paying for it. Additionally, multiple comments discussed the monetary benefit to AES and SLH, contended that AES and SLH have lobbied local and state officials, that there will be no benefits to the community, and that eminent domain may be used to acquire the Redondo Beach property for use by the City of Redondo Beach. Others urged the State Water Board to fulfill its responsibilities without regard to financial interests involved.

The State Water Board, in considering revisions to the compliance schedule set forth in the OTC Policy, seeks to implement the requirements of Section 316(b) and other applicable CWA provisions while ensuring reliability of California's electric system. The State Water Board exercises its regulatory authority to implement the CWA and other applicable laws and regulations within California. The rationale and considerations for the compliance date extension for Redondo Beach are described in Section 5 of the Staff Report.

Many comments expressed concerns regarding remediation or development plans for the facility and removal of associated infrastructure, such as power lines. The OTC

Policy governs facilities that are operating using OTC intake structures. Post-shutdown remediation plans for a facility are outside of the scope of the Amendment and must proceed in accordance with all applicable laws and regulations governing the property. Additionally, in response to comments concerned about remediation of the Redondo Beach property, SLH stated in its May 18, 2020 comment letter that plans for site remediation are already underway with the Department of Toxic Substances Control.

With regard to the Covenant entered into between AES and SLH, it is important to note that this agreement is outside the State Water Board's jurisdiction and the State Water Board was not involved in the negotiation of the Covenant. Prior to the close of escrow, AES and SLH executed and filed the Covenant with Los Angeles County as part of the property transfer detailing potential community benefits that the City of Redondo Beach may acquire if specific conditions are met. As stated in Section 5.5 of the Staff Report, if the compliance date for Redondo Beach is extended, AES would be able to continue operating the facility to support grid reliability up to the end of the approved extension, but no longer than necessary. All community benefits described in the Covenant are contingent upon the compliance date of Redondo Beach being extended by at least one year, with maximum potential benefits available if the power plant is extended for three years. Below is a summary of the Covenant:

- If the compliance date is extended by one year: At least four acres of the property dedicated for public open space (the first five acres must include the California Coastal Commission ("Coastal Commission") jurisdictional wetlands).
- If the compliance date is extended by two years: An additional eight acres of the property dedicated for public open space (for a total of twelve acres).
- If the compliance date is extended by three years: An additional thirteen acres of the property dedicated for public open space (for a total of twenty-five acres).

Additionally:

- AES will commit \$14 million dollars towards the cost of site clean-up
- The City of Redondo Beach has the option to purchase up to 15 acres of the property if the power plant is extended for three years.
- The purchase price for this acreage is \$2 million per acre, which is below market rate for the remediated land.
- The wetlands must be the first 5 acres purchased by the City of Redondo Beach and the remaining 10 acres that are available for purchase will be agreed upon between the Grantor and the City of Redondo Beach.
- If the City of Redondo Beach purchases all 15 acres available for its purchase, 10 acres will be dedicated for open space by SLH resulting in the 25 acres of dedicated open space, as noted above.

Purchasing options contained within the Covenant for the City of Redondo Beach to acquire up to 15 acres of the property are contingent on 1) a three-year compliance date extension for the Redondo Beach power plant by the State Water Board, and 2) written acceptance of the Agreement by the City of Redondo Beach by July 31, 2020, along with a payment of \$100 to SLH. Additionally, as stated in the Covenant, for it to be operative the extension must be "final and non-appealable" by the December 31, 2023 deadline for the City of Redondo Beach to exercise its purchasing option. The

compliance date extension can only be granted by the State Water Board through an amendment to the OTC Policy.

Multiple commenters expressed support for a three-year extension of Redondo Beach, for two main reasons: (1) ensuring grid reliability through 2023 as new resources come online and due to increased uncertainty in meeting procurement goals due to the ongoing COVID-19 pandemic, and 2) to accept the community benefits package offered by AES and SLH in the Covenant to ensure maximum open space in the future land use of the property. Furthermore, several comment letters discussed that without an extension of Redondo Beach and without accepting the offer negotiated by AES and SLH, there would be a lack of funds to restore or develop the property.

In its comment letter, SLH stated that without the requested extension, the Redondo Beach site will sit vacant without improvements until entitlements are secured from the City of Redondo Beach, and that without the public benefits package agreed to between SLH and AES, the City of Redondo Beach has no prospect of owning any portion of the Redondo Beach property.

The amendment to the OTC Policy is an inappropriate venue to determine controversial land use issues, especially where there is no consensus among the community and the private entities involved. Disagreements between the City of Redondo Beach, AES, SLH, or other entities as to local land use or the merits of any specific proposal for post-shutdown remediation and associated land use implications or zoning laws are not appropriate for the State Water Board to resolve pursuant to its regulatory authority. Please see Section 2 of the Staff Report for a description of the State Water Board's authority related to OTC facilities.

After Redondo Beach reaches final compliance with the OTC Policy, and as appropriate before the final compliance date, the City of Redondo Beach and all appropriate state and local regulatory agencies may proceed pursuant to their authorities in restoring coastal lands previously used by OTC power generating facilities.

2.2. Grid Reliability

This master response addresses many comments, questions, and concerns raised by commenters regarding grid reliability, including, but not limited to: the role and authority of the energy agencies, especially the CPUC, in the SACCWIS; the role of fossil-fueled OTC facilities, including Redondo Beach, in ensuring system-wide grid reliability; the relationship between renewable resources and grid reliability; and projected energy supply in the CAISO's Balancing Authority Area ("BAA").

2.2.1. Role of the SACCWIS

See Master Response 2.1.1 regarding the requirements of the OTC Policy. During the development of the OTC Policy, the State Water Board consulted with the CAISO, the California Energy Commission ("CEC"), and the CPUC to build a feasible compliance schedule for the facilities under the OTC Policy to come into compliance with minimal impacts to the electric grid, based on the planning and electricity procurement processes of the three energy agencies. These compliance dates were scheduled with

orderly retirements and planned replacement of capacity aimed at maintaining local and system-wide electrical grid reliability in the State of California.

The compliance dates for the OTC Policy were originally developed based on a report produced by the CEC, the CPUC, and the CAISO, titled *Implementation of OTC Mitigation Through Energy Infrastructure Planning and Procurement Changes*, and the accompanying table, titled *Draft Infrastructure Replacement Milestones and Compliance Dates for Existing Power Plants in California Using Once Through Cooling*.¹ The energy agencies designed compliance dates to maintain reliability of the electric system and stated that the dates specified in their original report may require periodic updates.

Section 1.1 of the OTC Policy describes the SACCWIS' role. Since energy regulation is outside of the expertise and authority of the State Water Board, the SACCWIS was convened to advise the State Water Board on the implementation of the OTC Policy, to ensure that the implementation schedule takes into account the reliability of California's electricity supply, including local area reliability, statewide grid reliability, and permitting constraints. The SACCWIS meets at least annually to review grid reliability studies from the CAISO and the Los Angeles Department of Water and Power, and to receive status updates on compliance from coastal power plant operators. The SACCWIS provides recommendations to the State Water Board if compliance schedule changes are needed to ensure the essential electrical power needs of the State are met. The SACCWIS includes representatives from the CEC, the CPUC, the Coastal Commission, the California State Lands Commission, the California Air Resources Board ("CARB"), the CAISO, and the State Water Board.

Furthermore, each of the three energy agencies that are part of the SACCWIS play a distinct role: the CPUC considers procurement authorizations for its jurisdictional load serving entities ("LSE's") and conducts system-wide reliability analysis; the CAISO conducts reliability analyses and examines infrastructure upgrades and additions in its transmission planning process; and the CEC evaluates and, when necessary, issues licenses to site new electric generation resources.

The SACCWIS' Memorandum of Agreement, which sets forth principles, procedures and agreements to which the signatory agencies of the SACCWIS commit themselves, states that the agencies and entities comprising the SACCWIS shall commit to working cooperatively towards fulfilling the obligations of the SACCWIS as described in the OTC Policy. The Memorandum of Agreement also states that it does not limit the rights or authority of any agency or entity participating in the SACCWIS.²

¹ State Water Resources Control Board (State Water Board). May 4, 2010. Final Substitute Environmental Document. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/otc_sed2010.pdf

² SACCWIS. Memorandum of Agreement Among the State Water Resources Control Board, California Air Resources Board, California Coastal Commission, California Energy Commission, California Public Utilities Commission (CPUC), California State Lands Commission, and California Independent System Operator Corporation (ISO) for

While the State Water Board retains the final authority to adopt amendments to the OTC Policy, the State Water Board relies on the SACCWIS to recommend compliance date extensions necessary to ensure the electrical power needs essential for the welfare of the citizens of the state are met. Furthermore, Section 3.B(5) of the OTC Policy states that the State Water Board will afford significant weight to compliance dates extensions unanimously recommended by the energy agencies in the SACCWIS in order to ensure grid reliability. The compliance date extensions proposed in the Amendment to address grid reliability concerns starting in the summer of 2021 are consistent with the SACCWIS' recommendation in the January 2020 SACCWIS Report and were reconfirmed in the May 27, 2020 Extension of Once-Through Cooling Policy Compliance Dates Joint Letter ("May 2020 Joint Energy Agency Letter") submitted by the CAISO, the CPUC, and the CEC to the State Water Board.

2.2.2. Events Leading to the Amendment and Alternatives Considered

The need for the proposed compliance date extensions for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach in the Amendment resulted from several compounding recent events, which have caused concern for system-wide grid reliability starting in the summer of 2021. These events are described in Section 5 of the Staff Report and are summarized below:

- Shifts in peak demand to later in the day (shifting from 4 p.m. - 6 p.m. to 7 p.m. - 9 p.m.) and later in the year (shifting from August to September) when solar and wind resources are not as reliably available to meet peak demand;
- Changes in the method for calculating the qualifying capacity of wind and solar resources resulting in lower qualifying capacity for these resources than previously determined;
- Uncertainty regarding the level of imports on which California can depend in the future as other states also shift towards using more renewable energy resources; and
- Unanticipated retirements of five non-OTC generating units.

As a result, additional power is likely needed for peak usage on hot days through 2023. These events are discussed in greater detail below.

For nearly two years, the CAISO has been raising concerns about potential grid reliability issues occurring in Southern California beginning in 2021, driven by the rapid deployment of solar generation in California combined with the retirement of Alamitos, Redondo Beach, Ormond Beach, and Huntington Beach by December 31, 2020. As discussed in the Staff Report, potential system-wide grid reliability issues were identified in June 2019, in the CPUC Rulemaking 16-02-007. This Ruling compared the estimated available capacity in the CAISO BAA from 2019 through 2028 against the 2018 approved Integrated Energy Policy Report peak demand forecast and estimated

Establishment and Operation of a Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS).

https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/moa.pdf.

system Resource Adequacy (“RA”) requirements for those same years.³ To analyze available supply, the CPUC staff incorporated the most up-to-date information regarding capacity available for system RA purposes, including existing resources, new resources that are expected to come online by 2028 (capacity that is already under construction or is otherwise anticipated by previous commission decisions), projected demand response, and projected availability of imports. On November 7, 2019, the CPUC approved its recommendation for extensions of compliance dates for OTC facilities to ensure grid reliability to the State Water Board in Decision (“D.”)19-11-016.⁴

The CPUC reaffirmed this Decision in its more recent March 2020 decision, D.20-03-028, which found that the CPUC should not modify any other OTC extension recommendations made in D.19-011-016 because reliability insurance may still be needed.⁵ It should be noted that GenOn – NRG California South LP (“GenOn”) filed a joint Petition for Modification with the City of Oxnard asking the CPUC to change D.19-011-016 so that it recommended a three-year extension for Ormond Beach rather than a one-year extension. The CPUC denied the Petition for Modification, finding in D.20-03-028 that it is ultimately not necessary for the CPUC to amend D.19-011-016 to change its recommendation on the Ormond Beach OTC Policy compliance deadline because the SACCWIS already recommended that the State Water Board accept the three-year extension negotiated by the City of Oxnard with GenOn. Furthermore, while D.19-011-016 remains unchanged, the CPUC updated its recommendation for Ormond Beach from a one-year extension to a three-year extension in D.20-03-028.

On January 23, 2020, the SACCWIS presented four alternatives for recommendations to ensure grid reliability through 2023. A description of each alternative is found in Section 5.1 of the Staff Report. These alternatives are summarized as follows:

- Alternative 1: No action.
- Alternative 2: Extend compliance dates for all four power plants (Alamitos, Huntington Beach, Redondo Beach, and Ormond Beach) for three years until December 31, 2023.
- Alternative 3: Extend compliance dates as follows:
 - Alamitos Units 3, 4, and 5 for three years until December 31, 2023,
 - Huntington Beach Unit 2 for three years until December 31, 2023,
 - Redondo Beach Units 5, 6, and 8 for two years until December 31, 2022, and
 - Ormond Beach Units 1 and 2 for one year until December 31, 2021.

³ CEC. [https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report#:~:text=The%20California%20Energy%20Commission%20prepares,Energy%20Policy%20Report%20\(IEPR\).&text=The%20report%20provides%20policy%20recommendations,protect%20public%20health%20and%20safety](https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report#:~:text=The%20California%20Energy%20Commission%20prepares,Energy%20Policy%20Report%20(IEPR).&text=The%20report%20provides%20policy%20recommendations,protect%20public%20health%20and%20safety).

⁴ CPUC. November 7, 2019. Decision Requiring Electric System Reliability Procurement for 2021-2023.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M319/K825/319825388.PDF>.

⁵ CPUC. March 26, 2020. 2019-2020 Electric Resource Portfolios to Inform Integrated Resource Plans and Transmission Planning.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M331/K772/331772681.PDF>.

- Alternative 4: Extend compliance dates as follows:
 - Alamitos Units 3, 4, and 5 for three years until December 31, 2023,
 - Huntington Beach Unit 2 for three years until December 31, 2023,
 - Ormond Beach Units 1 and 2 for three years until December 31, 2023, and
 - Redondo Beach Units 5, 6, and 8 for one year until December 31, 2021.

Consistent with its authority and the original intent of the OTC Policy, the SACCWIS adopted the January 2020 SACCWIS Report, approving Alternative 4 as its preferred recommendation to the State Water Board.

Alternative 4 would be responsive to supporting system-wide grid reliability concerns, address community requests, and provide a necessary “bridge” as new procurement comes online. The combined capacity from existing OTC units at Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach totals approximately 3,740 MW.

It should be noted that the SACCWIS recognized that Alternative 3, which was recommended by the CPUC in D.19-11-016, would address system-wide grid reliability needs. The CPUC recommended this alternative based on comments received during the Independent Review Panel (“IRP”) process and to minimize impacts on local communities near Ormond Beach and Redondo Beach expressed by stakeholders.

Alternative 2 would maximize (at roughly 3,740 MW) the existing OTC capacity available to meet reliability needs as 3,300 MW of new capacity comes online. Additionally, if the plants operate at current capacity under Alternative 2, the daily average OTC water use on a statewide scale is still predicted to match previously projected OTC cooling water use based on design flow rates of the OTC facilities through 2023. However, Alternative 2 was neither supported by the SACCWIS nor was Alternative 2 the unanimous recommendation of the energy agencies of the SACCWIS. The State Water Board relies on the recommendations of the SACCWIS and affords significant weight to the unanimous recommendations of the energy agencies of the SACCWIS in considering changes to the OTC Policy for grid reliability purposes pursuant to Section 3.B(5) of the OTC Policy.

Several commenters urged the State Water Board to adopt SACCWIS Alternative 1. Alternative 1 would provide no capacity bridge to the electrical shortfall projected to start in summer of 2021. Without the insurance of having these OTC units available, if needed, brownouts or blackouts could potentially occur, which would be disruptive at best to citizens, and at worst a health and safety issue for those who rely on continuous electricity for medical needs or to properly and safely conduct industrial processes.

Several commenters urged the State Water Board to adopt an amended version of SACCWIS Alternative 4, with the amendment being to not extend the compliance date of Redondo Beach. See Master Response Section 2.2.7 regarding Redondo Beach’s role in system-wide grid reliability.

The need to extend fossil-fueled OTC facilities included in the Amendment, including Redondo Beach, was reconfirmed in a May 27, 2020 joint letter submitted by the CAISO, the CPUC, and the CEC to the State Water Board. The CPUC D.19-011-016

informed the recommendation of the SACCWIS, and the Amendment is responsive to the recommendations of the SACCWIS, as directed by the OTC Policy. In formulating alternatives for State Water Board consideration of the Amendment, as described in Section 7 of the Staff Report, State Water Board staff considered the recommendations of the SACCWIS and afforded significant weight to the unanimous recommendation of the energy agencies in accordance with Section 3.B.(5) of the OTC Policy.

Several comments were received stating that, in recommending extensions for Redondo Beach and Ormond Beach differing from the CPUC's recommendation, the State Water Board has interfered with the CPUC's ability to carry out its policies and statutory mandates. The CPUC made explicit recommendations regarding proposed OTC facility compliance date extensions in D.19-011-016 and reaffirmed this stance in D. 20-03-028. The proposed compliance date extensions in the Amendment are informed by the SACCWIS recommendation and are not solely based on the CPUC's determinations and analysis. Furthermore, the recommendations of the SACCWIS are intended to reflect the policies and statutory mandates of the CPUC, and the Amendment does not preclude the State Water Board or the CPUC from acting according to their individual responsibilities and legal requirements.

2.2.3. Need for Energy Produced by Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach

Several commenters suggested that California has an excess of energy production and that new renewable energy resources, such as Southern California Edison's procurement of 770 MW of battery energy storage resources, will negate the need for the extension of some fossil-fueled OTC facilities. However, the factors identified in Master Response Section 2.2.2 show reduced electrical capacity available to meet peak demand during evening hours, even under average electricity demand scenarios.

The Amendment, based on the recommendations of the SACCWIS, is intended to address grid reliability concerns over the next three years. During proceedings of the CPUC IRP, the CAISO submitted a detailed analysis that suggests an RA deficiency of 2,300 MW during the gross peak demand hour in 2021. This projection only takes into account the qualifying capacity of available resources. When taking into account reduced solar generation available to meet peak demand from 4 PM to 9 PM, this deficiency may be as high as 4,400 MW.

Furthermore, the CAISO analysis is based on the average historical capacity of all other available resources, such as wind, hydroelectric, and imports, and it assumes that there will be no transmission or generation outages that exceed the planning reserve margin. This analysis also did not account for other factors that may impact available capacity, such as drought, climate change, increased competition for imports, risk of higher load than 1-in-2-year forecast load, or risk to transmission systems due to wildfires.

Taken together, the above factors present a case to propose extending the compliance deadlines. As stated in the May 27, 2020 letter, while the CPUC, the CEC, and the CAISO cannot confirm that all capacities of the four OTC facilities will be dispatched to meet system-wide grid reliability needs in 2021, the capacity of these OTC resources, both individually and combined, is needed to compensate for the band of uncertainty

and projected supply shortfalls that have been identified in 2021.⁶ Additionally, weather conditions, such as whether 2021 will be a dry and hot year, further accentuate uncertainty in grid reliability. An extraordinarily dry year may result in higher than normal loads due to elevated air conditioning use and lower-than-average hydroelectric capacity.

Some commenters referenced RA contracting and suggested that current energy market activities and prior agreements, particularly with regard to Redondo Beach, indicate a strong need for fossil-fueled OTC resources to meet RA requirements and ensure grid reliability. The Amendment, based on the recommendations of the SACCWIS, is intended to address grid reliability concerns over the next three years. Neither the CPUC nor the State Water Board is party to negotiations between owners or operators of OTC facilities and LSEs that purchase RA from those owners or operators, and neither the CPUC nor the State Water Board can advocate for or against particular RA contracts. Furthermore, the inability of an LSE to meet RA requirements does not automatically create shortfalls in system reliability.

The CAISO conducted an eight-year study, last modified in 2016, that spanned 2012 through 2020 to better understand the impact of renewable resources within its BAA. The study showed that steep ramp conditions, the risk of an oversupply of energy, and decreased frequency response by better managing supply and demand demonstrate the need for fossil-fueled OTC facilities in the short-term.

Ramp conditions or rates are the differential of a standard unit of output over a select time, such as hours or days. The CAISO study, which established net load curves for every day of the year from 2012 to 2020, revealed progressively steeper ramp rates over time. The study illustrated ramp conditions on January 11 of each year of the study as an example and showed four distinct ramp periods that occurred in this time frame. The first ramp, which is approximately 8,000 MW, occurs in the early morning between the hours of 4:00 AM and 7:00 AM. The second ramp decreases through the early afternoon. The third and most substantial ramp occurs at about 4:00 PM. This period occurs as solar generation decreases due to reduced sunlight, yet this ramp requires about 11,000 MW of ramp up. The fourth ramp trends downwards, and the CAISO must consequentially reduce or shut down generation in this period. Power grid ramp conditions change throughout the year due to variations in net load. For instance, spring ramping conditions are generally steeper, with previous peak period spring ramps requiring approximately 13,000 MW in additional power production over a three-hour period in the evening, all while solar generation is decreasing. Shorter and steeper ramp conditions indicate the need for the fossil-fueled OTC facilities in the short term as they are flexible and robust energy resources that can ramp up or shut down power generation rapidly. In contrast, renewable resources like wind and solar generally have a lesser degree of controllability and are variable.

⁶ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

The oversupply of energy occurs when power production exceeds real-time demand. Although oversupply is manageable in the short-term, it is not sustainable for longer periods. The potential for oversupply is increased as more renewable resource assets are brought online, which requires steps to mitigate risks.

Decreased frequency response is a measure of system supply and demand equilibrium. Typically, power grid disruptions affect system frequency, and automated equipment rapidly responds to this frequency change to restore balance. However, renewable generators may not provide for adequate frequency response capability at present, therefore jeopardizing automated system response.⁷ The ability of fossil-fueled OTC facilities, in the short term, to provide flexible energy resources that can ramp up and shut down power generation rapidly help to manage supply and demand.

The proposed compliance date extensions of Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach do not mean these power plants will operate at a higher capacity to serve base load. As noted in Section 5.2 of the Staff Report, these power plants are generally used like peakers and operate at a low capacity. If the compliance dates for these power plants are extended, they would continue to be used like peakers and would be expected to run at or below their current operating capacity. As replacement procurement comes online over the next three years, the fossil-fueled OTC facilities will likely be used less frequently. Furthermore, if future CPUC IRP processes show that the fossil-fueled OTC facilities are no longer necessary to ensure system-wide grid reliability during the approved extended compliance date periods, owners and operators could elect to retire the facilities early.

The ongoing COVID-19 pandemic has increased uncertainty in numerous ways. Potential impacts from COVID-19, including the potential for disruption to manufacture, shipment, or delivery of equipment; labor disruptions from quarantines, travel restrictions; shelter-at-home and social distancing requirements; or other areas as a result of the pandemic, may create new delay risks. Potential delays may also result from other COVID-19-related supply chain issues and/or potential permitting or inspection delays related to agency staff, budget, or procedural constraints.

The CPUC, CAISO, CEC are tracking changes in overall electricity demand resulting from increased telework, home schooling, and the overall decline in the economy. While there has been a decline in overall demand for electricity usage, demand at peak times of day are consistent with previous years' peak demand. Since the OTC facilities are needed to meet peak demand, the need for these plants appears to be the same over the next few years until the new generation and storage resources are brought on line.⁸ Furthermore, the next CEC Integrated Energy Policy Report, which may discuss the impacts of COVID-19, will not be released until January 2021 at the earliest. The

⁷ CAISO. Fast Facts.

https://www.caiso.com/Documents/FlexibleResourcesHelpRenewables_FastFacts.pdf

⁸ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines.

https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

agencies will continue to monitor peak demand to determine if forecasts for 2021 and 2022 need to be adjusted.

In response to concerns regarding the effects of COVID-19, the CPUC, CAISO, and CEC assessed potential impacts of COVID-19 on the progress of new resource development as ordered in the CPUC's D.19-11-016. The CPUC established a process to track the procurement and development of the new resources. Currently, the process suggests that most projects needing to be developed by August 1, 2021, are meeting their development milestones. While, the CPUC has identified a small number of projects that report a risk of delay in their targeted online dates, indications are that even with delays, most if not all of the CPUC-ordered 1,650 MWs will be online by August 1, 2021. The CPUC is continuing to monitor development of these resources.

If the CPUC's tracking of project development indicates a significant risk of delay in project online dates that would put California's electricity reliability at risk, the CPUC, CAISO, and CEC may return to the State Water Board in 2021 to request an additional one-year extension of OTC Policy compliance dates for units that are scheduled to comply at the end of 2021. The CPUC, CAISO, and CEC have communicated that they will not make such a recommendation unless an extension is absolutely necessary for grid reliability. Therefore, in order to ensure transparency, the energy agencies will provide quarterly reports to the State Water Board providing the status of all projects that are anticipated to be online by August 1, 2021, their targeted online dates, and any identified risk of delays. The State Water Board will assess additional recommendations pursuant to existing provisions in the OTC Policy, including, if necessary, compliance date suspension options in Section 2.B(2).

Some commenters suggested that fossil-fueled OTC facilities may not be needed to maintain grid reliability because of the procurement schedule set forth by the CPUC in D.19-011-016. However, the assertion that all 3,300 MW of procurement ordered by the CPUC will be operational by the start of 2023 is incorrect because there is uncertainty whether these procurement goals will be met on time. Additionally, the CPUC is targeting for 100% of the 3,300 MW of new procurement to be online by August 1, 2023, not the beginning of that calendar year.

Further, some commenters referenced their own calculations in opposing extensions of one or more fossil-fueled OTC facilities. However, these calculations generally rely on the lower end of the "bridge" that the OTC facilities are intended to fill, which is calculated from the upper limit of the projected shortfall of 4,400 MW. Therefore, in 2021, an estimated 2,750 MW is needed to bridge the gap.

Additionally, in D.19-11-016, the CPUC noted the possibility of delays in new procurement to meet short-term needs as a result of time needed to run solicitations, especially for some load serving entities who may be running solicitations for the first time; whether and where selected resources are within the CAISO interconnection queue; and the type of resources selected, which in turn impacts permitting and construction schedules.

Several commenters suggested that Alamitos and Huntington Beach have largely been replaced already, with three of six of Alamitos' OTC units already being offline and three

of four of Huntington Beach's OTC units already decommissioned. Furthermore, some commenters requested that the remaining operational units at Alamitos and Huntington Beach retire by the original compliance date of December 31, 2020.

Huntington Beach Units 3 and 4 retired in 2012 and Alamitos Units 1, 2, and 6 and Huntington Beach Unit 1 retired in 2019. These OTC units were retired before the established OTC Policy compliance date in order to offset emissions for new combined-cycle gas turbines to be brought online. As noted in the March 2019 Annual SACCWIS Report ("March 2019 SACCWIS Report"), Huntington Beach Units 1, 3, and 4 were replaced by non-OTC combined-cycle gas turbines, which were brought online in the latter half of 2019. Alamitos Units 1, 2, and 6 were retired in December 2019, and were replaced by four 3-on-1 combined-cycle gas turbines that were commercially brought online in April 2020. Moreover, as discussed in the Staff Report and supported by the CEC, the CASIO, and the CPUC, the compliance dates for Huntington Beach Unit 2 and Alamitos Units 3, 4, and 5 are proposed to be extended to support system-wide grid reliability over the next three years while new procurement comes online.

2.2.4. Dynamics of the Energy Grid

A number of commenters called into question the role of fossil-fueled OTC facilities in ensuring system-wide grid reliability. To clarify the role of these types of power plants in grid reliability, it is important to understand aspects of the electrical grid. For background, the electrical grid is a dynamic and complex system that is comprised of interconnected local electrical grids. These interconnections provide multiple pathways for power to flow, thereby building redundancy into the system such that service interruptions are minimized.⁹

System-wide grid reliability requires that power supply and demand must be equal at any given moment so as to not place unnecessary stresses on the electrical transmission system. To achieve system-wide grid reliability, the operation of regional grids is relegated to entities called balancing authorities, each of which is responsible for operating a BAA. California has several BAAs, the largest of which is operated and maintained by the CAISO.

To effectively maintain balance within a BAA, the responsible balancing authority continuously forecasts, monitors, and adjusts electrical supply to meet demand. Balancing supply and demand can be achieved through several processes, one of which is the dispatch of generation assets by the responsible balancing authority. Generally, dispatch involves two phases, the first of which involves identifying power generation units to commit to potential production in advance of forecasted demand. The second phase of this process entails dispatching generation assets, in which committed units are dispatched to operate at a particular level to meet demand. It should be noted that forecasting and monitoring electrical demand inherently contains a degree of uncertainty. However, balancing authorities generally conduct regular forecasting and RA analysis to predict energy demand and available production

⁹ U.S. Energy Information Administration. U.S. Electric System is Made Up of Interconnections and Balancing Authorities. <https://www.eia.gov/todayinenergy/detail.php?id=27152>

capacity. Balancing authorities may use this analysis to determine whether more capacity procurement is needed.

In California, the CPUC and the CAISO are obligated by the Public Utilities Code section 380 to maintain physical generating capacity and electrical demand response adequate to meet its load requirements, including, but not limited to, peak demand and planning and operating reserves.¹⁰ RA ensures the reliability of electric service in California, even under high demand or contingency scenarios. The RA program was developed in response to the California energy crisis that occurred in 2001, and it requires a 15 percent reserve margin.¹¹

As power demand is variable and production is tied to an array of factors, some types of electrical generation assets are dispatched to serve load more frequently than others, while other generation assets are generally reserved for peak demand, or contingency, periods. These facilities reserved for peak demand periods are colloquially referred to as “peakers.” The low capacity factors of peakers does not indicate that these facilities are unnecessary for grid reliability. For instance, peakers are dispatched when energy usage typically spikes during heat waves, when air-conditioning usage is widespread. Peakers also play a role in maintaining grid reliability during emergency scenarios, such as natural disasters that damage, destroy, or otherwise require the shutdown of electrical generation or transmission infrastructure. These periods often require dispatching facilities that are or can operate like peakers.

Because conventional generators take time to reach their allocated output and serve load, it is sometimes necessary to dispatch multiple peaker units in a similar time frame to meet demand. The CPUC staff analysis indicates that in prior peak demand periods, the fossil-fueled OTC facilities tended to operate at similar times or simultaneously. It is incorrect to assert that one existing fossil-fueled OTC facility can ramp up to replace another fossil-fueled OTC facility that retires (such as Redondo Beach). One fossil-fueled OTC generator generally cannot produce at the same output as multiple generators operating simultaneously in a small number of contingency hours. Because older fossil-fueled OTC units are not quick-start generators like simple combustion turbines, these units may be required to maintain a near-ready state so that they may be brought online in short order. While not designed as peaker plants, this “hot standby” status allows older fossil-fueled OTC facilities to act like peakers and serve load during contingency or emergency periods, thereby ensuring grid reliability.

2.2.5. Renewable Energy and Energy Storage

Several commenters requested that renewable energy be used to replace fossil-fueled OTC facilities. In its D.19-011-016, the CPUC noted that new fossil-fueled resources will be prohibited in its 3,300 MW procurement requirement to ensure system-wide grid reliability. Specifically, any new development of fossil-fuel-only resources, at sites without previous electric generation facilities, will not be considered to count toward any of the procurement obligations outlined in D.19-11-016. The CPUC D.19-011-016 finds

¹⁰ <https://www.cpuc.ca.gov/codelawsrules/>

¹¹ CPUC. August 2018. The 2017 Resource Adequacy Report.

<https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442458520>

that the capacity of existing fossil-fueled OTC units with deadlines extended by the State Water Board are not eligible to count toward the 3,300 MW incremental capacity procurement requirements discussed in this Decision. Thus, existing fossil-fueled OTC units do not compete with hybrid or renewable resources in this light.

Additionally, energy and environmental policy initiatives are already driving electric grid changes in California to support increased usage of renewable resources to satisfy the state's electricity demands.

A number of commenters also suggested that renewable energy sources or energy storage resources negate the need for fossil-fueled OTC facilities included in the Amendment or requested that renewable energy resources replace fossil-fueled OTC facilities. Some commenters also referenced state regulations or statutes requiring that California's energy grid incorporate more renewable energy resources in coming decades.

Balancing authorities may employ a number of generation resources to ensure grid reliability. In California, renewable energy resources, such as wind and solar, are progressively playing a larger role in electrical generation, as required by SB 100 and SB 350.^{12,13} Incorporating renewable energy resources into the grid is an important step in reducing greenhouse gas emissions and mitigating the impacts of climate change. As noted in Resolution No. 2007-0059, the State Water Board is committed to careful consideration of climate change strategies.¹⁴ The Amendment is primarily intended to address short-term grid reliability concerns while new renewable resources are procured or brought online over the next three years. It does not prevent the State Water Board from remaining committed to implementing effective strategies that address and mitigate the impacts of climate change.

While wind and solar resources are increasingly playing a greater role in renewable electricity production in California, they are inherently variable and production is directly tied to wind and solar availability and activity. This variability is reflected in the Effective Load Carrying Capability ("ELCC") and Net Qualifying Capacity ("NQC") values of these resources. ELCC expresses how well a resource is able to meet reliability conditions and reduce expected reliability problems or outage events (considering availability and use limitations), while NQC is the number of Megawatts eligible to be counted towards meeting a LSE's System and Local RA requirements, subject to deliverability

¹² California State Legislature. September 10, 2018. Senate Bill No. 100.
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB100

¹³ California Energy Commission. Clean Energy and Pollution Reduction Act – SB 350.
<https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350>.

¹⁴ State Water Board. September 18, 2007. Resolution 2007-0059.
https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2007/rs07_0059.pdf.

constraints.¹⁵ Table 11 details the most recent NQC of the fossil-fueled OTC facilities included in the Amendment, as noted in the March 2019 SACCWIS Report.

Table 11: NQC of Fossil-Fueled OTC Facilities Included in the Amendment

Facility and Units	NQC (MW)
Alamitos Units 3, 4, and 5	1,163
Huntington Beach Unit 2	215
Ormond Beach Units 1 and 2	1,516
Redondo Beach Units 5, 6, and 8	848

While renewable energy is playing a larger part in energy production in California and new renewable resources are currently under development or being procured by the CAISO, renewable resources like wind and solar generally have a lesser degree of controllability and are more variable than non-renewable resources. Hence, renewable energy resources generally have a lower NQC value compared to non-renewable forms of energy production. The need to respond to conditions such as steep ramp rates supports the need to extend the compliance dates of the four fossil-fueled OTC facilities until additional mechanisms under development can be brought online to ensure system-wide grid reliability. See Master Response 2.2.3 for additional discussion of the need for energy produced by Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach.

Similar to wind and solar, distribution-connected resources, such as battery storage, are playing a greater role in the operations of California’s electrical grid. Battery storage resources can help offset the variability of some renewable energy resources, though they also present a series of operational uncertainties that require careful planning to mitigate.¹⁶

2.2.6. Projected Energy Supply

The Amendment is based on energy supply projections made by the energy agencies of the SACCWIS and associated concerns regarding system-wide grid reliability. In the context of the OTC Policy, the CPUC defines system reliability as sufficient electrical capacity available to meet electricity demand in the CAISO’s BAA.¹⁷ As noted in the January 2020 SACCWIS Report, several factors have arisen in recent years that have caused the CPUC to reevaluate system reliability in regard to RA in California.

¹⁵ CPUC. January 16, 2014. Effective Load Carrying Capacity and Qualifying Capacity Calculation Methodology for Wind and Solar Resources.

¹⁶ CAISO. Fast Facts.

http://www.aiso.mobi/Documents/FastFacts_ISOStoragePilotProjects-AdvancingSmarterGrid.pdf.

¹⁷ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines.

https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

For one, peak electric demand has shifted to later in the year and later in the day, which reduces the ability of solar generation to meet peak capacity requirements. Historically, peak demand occurred earlier in the year and earlier in the day. However, recent forecasting suggests that peak demand will shift to September between the hours of 4:00 PM and 9:00 PM, when solar exposure and intensity is lessened.¹⁸ This peak demand shift consequentially affected the calculations of the ELCC values of solar and wind generation, which also reduced the NQC values of these resources by 43 percent and 66 percent, respectively.

Additionally, the CPUC indicated a higher degree of uncertainty regarding the level of imports on which California can depend. As noted above, several methods may be used to meet peak system demand. Aside from dispatching additional resources, balancing authorities may import electricity from other BAAs. The CAISO employs electricity imports to supplement existing generation resources, and it is allocated a maximum quantity of energy it may import, referred to as Maximum Import Capacity (“MIC”). As presented in the *Report of the SACCWIS on Local and System-Wide 2021 Grid Reliability Studies* (“August 2019 SACCWIS Report”) LSEs subject to the CPUC RA program, which represent roughly 90% of energy supply in the CAISO BAA, have historically generally relied upon less than 60 percent of the MIC to meet peak system RA requirements in recent years. This figure suggests that the CAISO system is already reliant on imports to meet peak system RA needs.

The August 2019 SACCWIS Report also notes that the CAISO system will become more dependent on imports following the retirement of remaining capacity from fossil-fueled OTC facilities and Diablo Canyon Nuclear Power Plant. In fact, most of the existing MIC allocated to the CAISO would be needed by 2021 to meet system RA requirements. However, it is unclear whether the CAISO could sustainably rely upon most or all of the MIC for RA purposes in the future, particularly given resource retirements in the rest of the Western Interconnection Grid and potential for lower-than-average hydrological years (and thus lower imports of hydroelectricity) from the Pacific Northwest.

As well as uncertainty over imports, several non-OTC generating resources have retired, or have indicated they plan to retire, earlier than expected. For example, roughly 640 MW at the fifty-five-year-old Etiwanda Generating Station permanently retired in June of 2018. The ten-year-old Inland Empire Energy Center permanently retired its 680 MW of capacity at the end of 2019. Some generators have also announced plans for mothballing or early retirement of non-OTC facilities, but subsequently re-entered the market. This creates forecasting uncertainty and complicates the orderly planning of capacity expansion within the CAISO BAA.

A CPUC IRP raised similar concerns as those above in its review of system reliability. The IRP also identified other potential issues that may jeopardize system reliability. For

¹⁸ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

one, some resources initially included in an analysis of the capacity baseline for reliability purposes are still under development and their commercial operation may be delayed. The CPUC has also indicated the potential for delays in procurement to meet short-term resource needs.¹⁹ These delays may be caused by several factors, including: time needed to run solicitations, especially for some LSEs who may be running solicitations for the first time; whether and where selected resources are within the CAISO interconnection queue; and the type of resources selected, which in turn impacts permitting and construction schedules.²⁰

Some commenters pointed to other factors as necessitating or negating the need for the OTC compliance date extensions for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach, or suggested critiques of the methodologies that the energy agencies of the SACCWIS employed in supporting proposed OTC facility extensions. However, the aforementioned reasons create a band of uncertainty that the Amendment is intended to address. This uncertainty regarding grid reliability was taken into account by the SACCWIS in its adoption of the January 2020 SACCWIS Report and support for SACCWIS Alternative 4. The May 2020 Joint Energy Agency Letter supports the recommendations of the SACCWIS, finding that analysis of grid reliability concerns has not changed since the SACCWIS convened in January 2020.

Furthermore, the State Water Board does not have the authority, jurisdiction or expertise to reevaluate the assumptions and analysis included in methodologies, models, and decisions employed by the energy agencies of the SACCWIS in supporting proposed OTC facility extensions. It should also be noted that the State Water Board does not have the authority or jurisdiction to make determinations regarding: the impact of energy resources, including hybrid resources, on grid reliability; arguments regarding the legal adequacy of decisions of the energy agencies of the SACCWIS, which are pursued in proceedings separate from the Amendment; underlying concerns of energy policy or barriers to interstate trade; requirements or enforcement actions, including associated penalties incurred, imposed by the energy agencies of the SACCWIS pursuant to their authority; and any prior or ongoing litigation between the energy agencies of the SACCWIS and other parties, which will proceed separately from this Amendment in the appropriate legal forum.

2.2.7. Redondo Beach's Role in System-Wide Grid Reliability

During the public comment period for the Amendment, a substantial number of comments were received that opposed the extension of Redondo Beach's compliance date beyond December 31, 2020. Many commenters suggested that the area already

¹⁹ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines.

https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

²⁰ Public Utilities Commission (CPUC). June 20, 2019. Ibid at 19. Rulemaking 16-02-007. Assigned Commissioner and Administrative Law Judge's Ruling Initiating Procurement Track and Seeking Comment on Potential Reliability Issues.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M319/K825/319825388.PDF>

has sufficient or excess energy and that there is therefore no need for an extension to Redondo Beach's compliance date. Several commenters suggested that there is a lack of evidence that Redondo Beach is needed for grid reliability purposes.

While originally constructed and used as a baseload resource, Redondo Beach now primarily functions like a peaker plant, and thus for the reasons noted in Section 5.1 of the Staff Report, a short-term extension is needed to ensure system-wide grid reliability.²¹

Several commenters suggested that there is a lack of evidence that Redondo Beach is needed for grid reliability purposes. The energy agencies of the SACCWIS have conducted rigorous forecasting and, for the reasons stated above and in Section 5.1 of the Staff Report, have recommended that the compliance date for Redondo Beach, which has a capacity of approximately 850 MW, be extended to ensure system-wide grid reliability through 2021. In summary, this reasoning is due to: shifts in peak electric demand to later in the year and later in the day, which reduces the ability of solar and wind resources to meet peak capacity requirements; changes in the method for calculating the qualifying capacity of wind and solar resources resulting in lower qualifying capacity for these resources than previously determined; uncertainty regarding the level of imports on which California can depend in the future; and some unanticipated non-OTC generator retirements. Additionally, there is uncertainty as to the future capacity of hydroelectric resources, potential delays in the commercial operation of the CAISO resources that are under development, and potential delays in new procurement needed to meet short-term needs.²²

While the CPUC, the CEC, and the CAISO cannot confirm that all capacities of fossil-fueled OTC facilities under the State Water Board's consideration will be dispatched to meet system-wide grid reliability needs in 2021, the capacity of these fossil-fueled OTC resources, both individually and combined, is needed to compensate for the band of uncertainty and projected supply shortfalls that have been identified in 2021.²³

The proposed compliance date extension of Redondo Beach, as well as the other fossil-fueled OTC units included in the Amendment to address grid reliability, is also reflective

²¹ State Water Board. March 18, 2020. Draft Staff Report to the Amendment to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling for Extension of Compliance Schedules of Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/otc_policy_2020/dftsr.pdf.

²² Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

²³ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

of conclusions set forth in the CPUC D.19-011-016, which proposes extension of fossil-fueled OTC capacity as a ‘least regrets’ strategy to ensure system reliability. This ‘least regrets’ strategy is associated with the considerable time and resources required in maintaining grid reliability. For instance, the former owner and current operator of Redondo Beach, AES Southland, emphasized that “once a decision is made to retire an OTC Plant, the retirement is permanent and there is no ability to restart the plant if unexpected conditions arise.” The proposed extension of Redondo Beach’s compliance date ensures that it can serve load and contribute to grid reliability as needed.

Relatedly, several commenters suggested that Redondo Beach provides negligible capacity towards system-wide grid reliability, pointing to Redondo Beach’s operational capacity in 2018, which was approximately 2 percent. Low capacity factors do not negate the significance of Redondo Beach in maintaining grid reliability. As noted above in Section 2.2.5, fossil-fueled OTC generators such as Redondo Beach, which are often operated like peakers, are typically dispatched when demand is high and the CAISO has limited other options to maintain grid reliability.²⁴ As noted above, Redondo Beach Units 5, 6, and 8 have a NQC of 848 MW.

Some commenters suggested that the proposed extension of Alamitos also negates the need for Redondo Beach’s proposed compliance date extension. The assertion that Alamitos may compensate for other fossil-fueled OTC facilities is incorrect, as one fossil-fueled OTC generator cannot ramp up to replace another fossil-fueled OTC generator that retires.

Furthermore, the CAISO must maintain balance between electrical supply and demand, and as demonstrated above, this requires dispatching and shutting down resources frequently. Because conventional generators take time to reach their allocated output and serve load, it is sometimes necessary to dispatch multiple units in a similar time frame to meet demand; one fossil-fueled OTC generator generally cannot produce at the same output as multiple generators in a short time frame. As such, the proposed compliance date extension for Redondo Beach is necessary in ensuring the CAISO can adequately react to contingency and very high peak demand periods.

Without an extension of Redondo Beach to the end of 2021, approximately 2,900 MW would be available from OTC units at Alamitos, Huntington Beach, and Ormond Beach. As noted above, the energy agencies expressed that the estimated system-wide shortfall starting in summer 2021 ranges from 2,300 MW to 4,400 MW, and the combined capacity of all fossil-fueled OTC units included in the proposed OTC Policy amendment is approximately 3,740 MW.

Conversely, some commenters proposed extending the compliance date for Redondo Beach through December 31, 2023 rather than December 21, 2021. However, as noted in the Staff Report, the SACCWIS adopted Alternative 4 as its recommendation to the State Water Board. This alternative, which proposed extending the compliance date for

²⁴ Joint Letter of the CPUC, CEC, and CAISO. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/joint_letter.pdf.

Redondo Beach for one year instead of two or three, is partly responsive to comments from the mayors of the City of Redondo Beach and the City of Hermosa Beach to the State Water Board on November 19, 2019. Both cities expressed opposition to an extension of Redondo Beach's OTC Policy compliance deadline. Extending Redondo Beach for one year would ensure the availability of its capacity during 2021.

A number of commenters suggested that potential delays in the Southern California Edison Mesa 500-kV Substation Project could cause local grid reliability concerns in the western Los Angeles basin, and that Redondo Beach should be extended for three years for this reason. However, this project appears on schedule and is expected to come online in March 2022.

Multiple commenters also expressed support for a three-year extension of Redondo Beach, in part to ensure grid reliability through 2023 as new resources come online and due to increased uncertainty in meeting procurement goals due to the ongoing COVID-19 pandemic. Please refer to Master Response 2.1 for additional information on these issues.

Several commenters suggested that Redondo Beach is too antiquated to be useful for peak demand use or that it takes too long to activate to use like a peaker. While it is true that Redondo Beach uses older technology, it is still periodically dispatched to permit the CAISO to adequately serve load in peak demand periods. Additionally, as noted above, the dispatch process often involves two phases, in which near-future forecasting of demand elicits the balancing authority to commit resources in the forecasted period. However, even with rigorous forecasting and monitoring of system conditions, future system demand projections inherently contain a degree of uncertainty and are impossible to predict exactly. This fact also means that potential capacity shortfalls cannot be calculated with unequivocal certainty.

Therefore, as the CAISO must respond to system demands in real-time, it is necessary to maintain enough resources to adequately meet rapid shifts in demand. As previously noted, the fossil-fueled OTC facilities take time to ramp up and reach maximum capacity. Several generators may operate in a similar time frame or simultaneously to supply enough load to meet peak demand. While combined maximum capacity of these four facilities exceeds the CPUC order to procure 3,300 MW in D.19-011-016, these facilities generally do not produce electricity to maximum capacity immediately after they are dispatched.²⁵

There were also concerns over local versus system-wide grid reliability, with commenters suggesting that Redondo Beach does not supply local power. However, system-wide and local grid reliability are closely related. As noted above, the electrical grid is comprised of interconnected systems that increase system-wide reliability by allowing BAAs to adequately respond to demand, which varies geographically and temporally. Maintaining local grid-reliability therefore inherently requires maintaining system-wide grid reliability. Because Redondo Beach plays an important role in

²⁵ CPUC. November 7, 2019. Decision 19-011-016. <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M319/K825/319825388.PDF>.

maintaining system-wide grid reliability, it also contributes to local reliability in the City of Redondo Beach.

Finally, many commenters suggested that Redondo Beach uses outdated technology and needs to be shuttered. The OTC Policy provides several methods for owners and operators of OTC facilities to come into compliance. In its' implementation plan and subsequent annual updates to the State Water Board, AES opted to retire this facility to comply with the OTC Policy. The proposed compliance date extension of Redondo Beach does not reverse the decision to ultimately retire this facility, but provides additional time to ensure grid reliability is maintained in the CAISO BAA while new generating resources come online.

Additionally, it is true that Redondo Beach employs older generating technology, similar to the other fossil-fueled OTC units that were constructed in the late 1940s to early 1960s. However, the facility has transitioned over time from being used as a baseload resource to being operated like a peaker, the latter of which generally operates in times of high demand. This transition was largely due to the costs associated with operating older power plants. The age of Redondo Beach's generators means they require more energy input per unit output, and thus have higher marginal costs to operate. The CAISO generally dispatches resources when demand drives energy prices above those resources' costs, so resources such as Redondo Beach are dispatched less frequently than newer, more efficient generators. However, the CAISO is required by Section 380 of the Public Utilities Code to maintain system-wide grid reliability, which presents the case to extend Redondo Beach's compliance date until new resources are brought online to ensure grid reliability.

2.3. Water Quality, Impacts to Marine Life and Mitigation

2.3.1. Water Quality

Several comments were received stating concerns about impacts to water quality and marine life from operating OTC facilities. Impacts to water quality and marine life are addressed through the OTC Policy, the intent of which is to ensure that the beneficial uses of the state's coastal and estuarine waters are protected while also ensuring that the electrical power needs essential for the welfare of the citizens of the state are met. Consideration of the Amendment for grid reliability purposes does not preclude the State Water Board from considering impacts on water quality according to its authority.

In addition to the OTC Policy, impacts to water quality and marine life are addressed by CWA section 316(b), which requires that the location, design, construction, and capacity of cooling water intake structures reflect the BTA for minimizing adverse environmental impact. Section 316(b) is also implemented through National Pollutant Discharge Elimination System ("NPDES") permits, issued pursuant to CWA section 402, which authorize the point source discharge of pollutants to navigable waters. The Regional Water Quality Control Boards ("Regional Water Boards") issue NPDES permits within their jurisdiction. Alamitos, Redondo Beach, and Ormond Beach are within the Los Angeles Regional Water Board's jurisdiction and Huntington Beach is within the Santa Ana Regional Water Board's jurisdiction.

The discharges of these power plants are regulated by the following NPDES Permits: NPDES Permit No.CA0001201 for Redondo Beach; NPDES Permit No.CA0001198 for Ormond Beach; NPDES Permit No.CA0001139 for Alamitos; and NPDES Permit No.CA0001163 for Huntington Beach. Additionally, Alamitos, Huntington Beach, and Redondo Beach have been issued time schedule orders (“TSO”) by the respective Regional Water Boards. TSOs are enforcement actions issued in accordance with Section 13300 of the California Water Code that require the discharger to submit a time schedule establishing actions that the discharger will take to address actual or threatened discharges of wastes in violation of requirements, such as discharging identified constituents over the approved maximum limitation. In the case of these OTC facilities, the scheduled date for compliance with the TSO conforms with the facilities’ compliance dates in the OTC Policy.

Several comments were also received concerning impacts to marine life from warm water discharges from the OTC facilities. Thermal discharges from these facilities are regulated by CWA section 316(a), which is implemented through the Water Quality Control Plan for the Control of Temperature In the Coastal and Interstate Waters and enclosed Bays and Estuaries of California (also known as the Thermal Plan), and therefore are outside of the scope of the Amendment.

In the event of an OTC Policy compliance date extension for Huntington Beach, Ormond Beach, and Redondo Beach generating stations, these facilities’ NPDES permits and other regulatory documents will need to be amended. Concurrently along with this policy amendment, the Los Angeles Regional Water Board intends to consider reopening and amending the TSO, NPDES permit, and San Gabriel River Metals Total Maximum Daily Load for Alamitos; the TSO and NPDES permit for Redondo Beach; and the NPDES permit for Ormond Beach. Additionally, the Santa Ana Regional Water Board may need to consider reopening and amending the NPDES permit and TSO for Huntington Beach.

Several comments were also received regarding potential impacts to marine life from Redondo Beach Units 5 and 6, as they require larger amounts of OTC intake water. The 2010 Final SED showed that OTC units among the nineteen power plants operated at varying efficiencies (volume of cooling water in millions of gallons required per megawatt-hour generated), depending on the type of boiler system and general age of the unit. For example, combined-cycle units were found to be up to 50% more efficient than steam boilers. Alamitos Units 3, 4, and 5, Huntington Beach Unit 2, Ormond Beach Units 1 and 2, and Redondo Beach Units 5, 6, and 8 are all steam boilers, with Redondo Beach Units 5 and 6 being the oldest (they started operation in 1954 and 1957, respectively). Of the four facilities, Redondo Beach is the least efficient, requiring more OTC intake water to produce a megawatt-hour than the other power plants (Figure 11 in the 2010 Final SED).²⁶

²⁶ State Water Board. May 4, 2010. Final Substitute Environmental Document. P.41 Figure 11. Ratios of Average Cooling Water Flow to Energy Generation https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/cwa316may2010/sed_final.pdf

Since adoption of the OTC Policy, Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach have generally operated at decreasing capacities, with average annual capacity factors decreasing from 7.7% in 2012 to 4.4% in 2018. If extended, these four fossil-fueled OTC facilities are expected to be operated at or below average annual capacity factors from 2018, thereby minimizing impingement and entrainment impacts from 2010 and pre-2010 impacts. Impacts to marine life are expected to be at or below the baseline established in the 2010 Final SED if the compliance dates for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are extended.

Several comments expressed concerns that continued operation of the OTC facilities would exacerbate impacts to ocean waters and coast lines from climate change. Section 35630 of the Public Resources Code recognizes that anthropogenic greenhouse gas emissions responsible for climate change are also driving major shifts in the chemical properties of the world's oceans. Although the geographic scope of ocean changes resulting from climate change may be widespread, local stressors can increase their occurrence and compound their effects on both marine ecosystems and coastal communities.²⁷ The wastewater discharge from OTC power plants may act as a local stressor.

The Amendment does not prevent associated facilities from ultimately retiring or modifying their cooling systems to reduce the use of OTC water, as discussed in Master Response 2.1.1. Furthermore, if the compliance dates for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are extended as recommended by the SACCWIS' Alternative 4 and the plants operate at current capacity (4.4% average annual capacity), the daily average OTC water use on a statewide scale is projected to be at or below the design flow rates from the original OTC Policy compliance schedule, as noted in Section 5.3 of the Staff Report. Additional information regarding the relationship between fossil-fueled OTC facilities and climate change can be found in Master Response 2.2 and Master Response 2.5.

2.3.2. Impacts to Marine Life and Interim Mitigation Payments

Several comments expressed concerns about impacts to marine life and wetlands due to the use of cooling water intake structures. Additionally, some comments were received urging the State Water Board to increase the monetary amount of interim mitigation payments that owners or operators of OTC facilities would have to pay annually in the event of compliance date extensions for the four fossil-fueled OTC facilities, and that the current method of calculating interim mitigation payments to offset the impacts of entrainment and impingement are not sufficient.

The nineteen power facilities that are regulated by the OTC Policy were collectively able to withdraw billions of gallons of water every day to cool steam for generating electricity. In the process, millions of fish, larvae, eggs, seals, sea lions, turtles, and other creatures are killed each year by plants continuing to use OTC because they are either trapped against screens or were drawn into the cooling system where they are exposed

²⁷ State Water Board. December 3, 2019. Final Staff Report and Work Plan for 2019 Review of the Water Quality Control Plan for Ocean Waters of California. https://www.waterboards.ca.gov/water_issues/programs/ocean/docs/sr_2019opr.pdf.

to pressure and high heat. The marine life that is killed is mainly at the base of the food chain and that can adversely affect the future of certain species and adversely impact recreational and commercial fishing. Today, nine of the original OTC power facilities are still operating.

Since adoption of the OTC Policy on May 4, 2010, Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach have operated at decreasing capacities, with average annual capacity factors decreasing from 7.7% in 2012 to 4.4% in 2018. If extended, these four fossil-fueled OTC facilities are expected to be operated at or below annual average capacity factors from 2018, thereby minimizing impingement and entrainment impacts as compared to 2010 or pre-2010 impacts. As discussed in Section 5.3 of the Staff Report, impacts to marine life are expected to be at or below the baseline established in the 2010 Final SED if the compliance dates for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are extended.

See Master Response 2.1.1 for a discussion of the requirements of the OTC Policy, including a description of Track 1 and Track 2.

The OTC Policy requires owners or operators of existing power plants to implement measures to mitigate interim impingement and entrainment impacts resulting from their cooling water intake structures, commencing October 1, 2015, and continuing up to and until the owner or operator achieves final compliance. Section 2.C(3) of the OTC Policy lists several options for owners or operators to comply with interim mitigation requirements. Each option requires that the owners and operators demonstrate to the State Water Board's satisfaction that the measures are compensating for the impacts or require State Water Board approval. Owners and operators could also elect to comply via a combination of the interim mitigation options in Section 2.C(3) of the OTC Policy.

In 2015, the State Water Board adopted Resolution No. 2015-0057 delegating authority to the Executive Director to approve, on a case-by-case basis, mitigation measures that owners and operators of OTC facilities shall undertake to comply with requirements for interim mitigation. Furthermore, Resolution No. 2015-0057, set forth measures by which owners and operators could comply with the interim mitigation option in Section 2.C.(3)(b) of the OTC Policy, based on the findings of the Expert Review Panel II ("ERP II"). Most owners and operators elected to comply with interim mitigation requirements via Section 2.C(3)(b) of the OTC Policy, which directs interim mitigation funds to be paid to the Ocean Protection Council ("OPC") and State Coastal Conservancy ("Conservancy") to fund appropriate mitigation projects.

Section 2.C.(3)(e) of the OTC Policy states that it is the preference of the State Water Board that funding is provided to the Conservancy, working with the OPC for mitigation projects directed toward increases in marine life associated with the State's Marine Protected Areas (MPA) in the geographic region of the facility, including restoration of wetlands. Mitigation projects are defined in the OTC Policy as projects to restore marine life lost through impingement mortality and entrainment, and may include projects to restore and/or enhance coastal marine or estuarine habitat, and may also include protection of marine life in existing marine habitat, for example through the funding of implementation and/or management of MPAs. Projects that the OPC funds with the interim mitigation payments are intended to support and protect the MPA

network. In accordance with the 2016 Memorandum of Agreement entered into by the State Water Board, the OPC, and the Conservancy, the State Water Board participates in the selection process and approves of appropriate mitigation projects.

As stated in the Staff Report, AES, operator of Alamitos, Huntington Beach, and Redondo Beach, elected for its Alamitos and Redondo Beach sites to comply with interim mitigation requirements via Section 2.C(3)(b) of the OTC Policy and its Huntington Beach site to comply with interim mitigation requirements via Sections 2.C(3)(a), 2.C(3)(b), and 2.C(3)(e) of the OTC Policy.

After purchasing Ormond Beach from NRG Energy, Inc. in 2018, GenOn elected to continue to comply with interim mitigation requirements for Ormond Beach through Section 2.C(3)(b). Consistent with an October 2014 settlement agreement between the State Water Board and Ormond Beach's previous owner, NRG Energy, Inc., interim mitigation payments for this power plant are made directly to the Conservancy for the restoration of the Ormond Beach Wetlands Complex.²⁸

The process to calculate interim mitigation payments was approved by the State Water Board on August 18, 2015, in Resolution No.2015-0057. The State Water Board had previously contracted with Moss Landing Marine Laboratory to establish ERP II on minimizing and mitigating intake impacts from power plant and desalination facility seawater intakes. ERP II developed a scientifically defensible mitigation fee for facility interim mitigation that would compensate for continued intake impacts due to impingement and entrainment, which was the basis of the interim mitigation calculation method set forth in Resolution No. 2015-0057. The interim mitigation payment calculation developed in ERP II comprises an entrainment payment, an impingement payment, and a management payment for implementation and monitoring of the mitigation project. The entrainment fee calculation utilizes empirical transport models coupled with the habitat production forgone method, as required by the OTC Policy, and is based on the cost of creating or restoring habitat that replaces the production of marine organisms killed by entrainment. The interim mitigation payment calculation developed by the ERP II was intended to compensate for continued intake impacts due to impingement and entrainment and was determined to be adequately protective of marine life and water quality.

In accordance with Resolution No. 2015-0057, interim mitigation payments are calculated annually for each individual OTC facility, comprising the elements discussed above. The entrainment calculation is based on the volume of OTC water used during the annual interim mitigation period multiplied by either a site-specific or default average cost of entrainment determined in the ERP II's Final Report. Resolution No. 2015-0057 states that when site-specific entrainment data is available for a facility, the Executive Director shall determine whether this data is suitable for calculating a specific habitat production forgone for that plan. Otherwise, owners and operators electing to comply

²⁸ State Water Board. December 11, 2017. Interim Mitigation Measures Payment for Ormond Beach Generating Station Under the Once-Through Cooling Policy. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/ormondbeach_1516mitigation_letter.pdf.

with interim mitigation requirements consistent with Section 2.C.(3)(b), shall use the default method for calculating the entrainment component of the interim mitigation calculation. Each site-specific or general entrainment rate is multiplied by a 3 percent escalator each year to update the average cost of entrainment to account for inflation. The impingement calculation is based on the pounds of fish impinged during the annual interim mitigation period multiplied by the average indirect economic value of the fisheries. The management and monitoring payment is calculated by taking 20 percent of the sum of the entrainment and impingement calculations.

The interim mitigation period commenced on October 1, 2015, and owners or operators are required to satisfy interim mitigation requirements until the OTC facilities achieve final compliance with the OTC Policy. Continued interim mitigation requirements apply if there are compliance date extensions.

Although the State Water Board recognized that these requirements incentivize early compliance with the OTC Policy, interim mitigation is generally intended to address the interim impacts of impingement and entrainment due to continued operation of these facilities during the phase-in period established for final compliance. Furthermore, and as represented in the mechanisms set forth in the OTC Policy, the State Water Board recognized that modifications to the compliance schedules in the OTC Policy may be needed to address grid reliability concerns. Moreover, the OTC Policy did not dictate that these facilities must shut down to be meet final compliance with the OTC Policy. Please see Master Response 2.1 for a discussion on potential misconceptions about what is required for compliance with the OTC Policy.

In 2017, the State Water Board approved an OTC Policy compliance date extension for Encina Power Plant for one year until December 31, 2018. As with the Encina amendment, Alamitos, Huntington Beach, Ormond Beach, Redondo Beach, and Diablo Canyon would all continue to fulfill interim mitigation requirements and provide mitigation payments to address the water quality-related impacts of continuing operation if the compliance dates are extended.

The assertion that additional mitigation is needed to extend the compliance date of power plants implies that there are additional environmental impacts not previously analyzed or addressed in the 2010 Final SED or in the addendum to the 2010 Final SED in the Staff Report. In 2010, the State Water Board conducted a full CEQA analysis on the potential impacts of the proposed adoption of the OTC Policy, including significant or potentially significant adverse environmental impacts of the project and impacts associated with reasonably foreseeable methods of compliance. As stated in the Staff Report, continued operation of selected power plants for grid reliability reasons is within the original baseline and does not lead to new significant environmental impacts or a substantial increase in the severity of previously identified environmental effects. Any requirement for new or additional mitigation would conflict with these findings. The State Water Board does not intend to re-evaluate the process used to calculate interim mitigation payments at this time, as they continue to be appropriate. Please refer to Master Response 2.6 for a more detailed CEQA discussion.

For the reasons discussed above, the State Water Board authorized the Executive Director, on a case-by-case basis, to approve the measures by which owners and

operators proposed to comply with the interim mitigation requirements. Neither Resolution No. 2015-0057 nor the OTC Policy include provisions to increase interim mitigation requirements, or payments if complying with Section 2.C.(3)(b) of the OTC Policy when a compliance date is modified to ensure grid reliability.

2.4. Wetlands

This master response focuses on comments received regarding the 5.93 acres of wetlands on the Redondo Beach property. Comments regarding these wetlands included, but were not limited to: expressing the importance of protecting wetlands and their role in promoting healthy ecosystems and building climate resiliency; giving the City of Redondo Beach the ability to preserve the wetlands on the Redondo Beach property instead of outside entities; opposition to extending Redondo Beach's operations due to dewatering onsite wetlands; the potential for jeopardizing a grant that the City of Redondo Beach received from the California Natural Resources Agency ("CNRA") towards acquiring part of the property for wetland restoration and greenspace development; and potential delays in restoration of the onsite wetlands if Redondo Beach's compliance date is extended.

Wetlands are important features that provide a variety of benefits including shelter and feeding grounds for wildlife, water quality improvements, mitigating climate change, and aesthetic appeal. In 1976, the Coastal Act was enacted by the State Legislature to provide long-term protection of California's coastline through implementation of a comprehensive statewide planning and regulatory program designed to manage conservation and development of coastal resources. The Coastal Commission, created by and charged with administering the Coastal Act, plans and regulates the use of land and water in the coastal zone and has regulatory control over all federal activities and federally licensed, permitted or assisted activities, wherever they may occur. Additionally, coastal cities may develop a Local Coastal Program ("LCP"), which is a planning tool used by local governments to guide development in the coastal zone in partnership with the Coastal Commission. The LCPs contain ground rules for future development and protection of coastal resources, including land use plans and measures to implement the plan, such as zoning ordinances. Following adoption of an LCP by a city council or county board of supervisors, the LCP is submitted to the Coastal Commission for review for consistency with Coastal Act requirements.

As stated in the Staff Report and discussed in Master Response Section 2.3 above, the OTC Policy requires owners or operators of existing power plants to implement measures to mitigate interim impingement and entrainment impacts resulting from their cooling water intake structures. Most owners and operators elected to comply with interim mitigation requirements via Section 2.C(3)(b) of the OTC Policy, which directs interim mitigation funds to the OPC and the Conservancy to fund appropriate mitigation projects to increase life in MPAs, including restoration of wetlands. For more information on the OTC Policy's interim mitigation requirements, please refer to Master Response Section 2.3.

2.4.1. Impacts to Wetlands on the Redondo Beach Property

In 2014, it was determined that 5.93 acres of Coastal Commission-jurisdictional wetlands were located within the former tank area in the northeastern part of the Redondo Beach property. The wetlands were determined to be part of a historic natural wetland area, referred to as the “Old Salt Lake,” which existed before the site was filled and developed for power generation in the 1940s and 1950s. SCE, who owned and operated the generating facility on the Redondo Beach property prior to AES, which purchased the property in 1998, installed and operated groundwater wells in the former tank basin area. A May 26, 2020 Notice of Violations (“NOV”) from the Coastal Commission to AES acknowledges that AES disputes the Coastal Commission’s conclusion that there are wetlands at the site. The NOV also acknowledges that AES asserts that “any wetlands characteristics within the site were artificial hydrological features resulting from water moving to the site from a series of injection wells located from about one half-mile to a mile from the site and operated by the County of Los Angeles Public Works Department.” The series of injection wells referred to here are a part of the Barrier Project, which was installed to provide a freshwater barrier to mitigate seawater intrusion into freshwater aquifers that were being over-pumped. However, the NOV finds that the wetlands on the Redondo Beach property exhibited wetland characteristics several times in the past century, as well as prior to development. The Coastal Commission NOV states: “It appears that, instead of the injection well system creating artificial hydrology, the facility’s dewatering system has acted to mask existing wetland characteristics within the site. These characteristics appear to be present even when the dewatering system is apparently functioning as intended. Moreover, even if the wetland features were shown to be anthropogenic, that would not stop those features from causing the area to be appropriately characterized as a wetland.”

In a letter to AES dated August 27, 2015, the Coastal Commission detailed several unpermitted development activities, including, but not limited to, installation and operation of new groundwater pumps in the former tank basin area adversely affecting, or having the potential to adversely affect, the identified wetlands. AES subsequently stopped dewatering the former tank basin area. On August 17, 2017, AES obtained an emergency Coastal Development Permit (“CDP”) to perform limited pumping from the City of Redondo Beach, which was followed by two approved extensions of the emergency CDP that expired on February 15, 2018. AES requested a third extension of the emergency CDP, which was denied by the City of Redondo Beach due to failures to comply with previous emergency CDP conditions. The City of Redondo Beach informed the Coastal Commission of two recent unpermitted dewatering events: one in 2019 and 2020. At some point in time and without first obtaining a CDP from the City of Redondo Beach, AES had begun using sump or portable pumps to pump water out of electrical and utility vaults serving the facility. AES stated in its comment letter dated May 18, 2020, that there are no on-going safety or operational risks and the power plant can be safely and reliably operated through 2023 due to operation of the portable pumps. The site has had extensive development since the establishment of the power plant, but the wetlands continue to persist.

In the NOV, AES was directed to complete the following: cease any unpermitted dewatering of the former tank basin area; submit a complete CDP application to the City

of Redondo Beach by June 30, 2020, seeking authorization to remove the dewatering system in the former tank basin and either retain or remove the vault pumping system; and submit to the City of Redondo Beach and the Coastal Commission by June 30, 2020, a response to information requests in the NOV related to the vault pumping system. On June 30, 2020, the Coastal Commission received a CDP application providing alternatives and seeking authorization to permanently retire or remove the groundwater dewatering system from the former tank basin area. The Coastal Commission will continue coordinating with AES, seeking to ensure that AES fulfills the other requirements of the NOV.

If the OTC compliance date extension is granted, neither AES or SLH are absolved from complying with existing state and local permits, laws, and regulations. Additionally, any litigation between the Coastal Commission and AES will proceed in an action separate from the Amendment and outside the purview of the State Water Board's CWA section 316(b) authority. Further, the OTC Policy does not prevent the Coastal Commission from administering the Coastal Act pursuant to its authority.

Prior to 2020, the City of Redondo Beach applied for and was awarded a grant from the CNRA from Prop 68 funds of \$4,829,000 for the partial funding towards a purchase by the City of Redondo Beach from SLH Fund. The purpose of the purchase would be to eventually restore approximately 15 acres of the Redondo Beach property, including historical wetlands, as part of a regional park. The project continues to meet the requirements of Public Resources Code section 80137(a)(2) because at the time of the effective date of the statute and City of Redondo Beach's application, the power plant was scheduled to retire prior to January 1, 2021. At the time the award was granted, the plant was on track to retire by the specified date. Therefore, under CNRA interpretation of the statute, the funding will not be withdrawn if Redondo Beach's compliance date is extended beyond December 31, 2020. Section 5.5 of the Staff Report has been revised with updated information on the wetlands degradation at Redondo Beach, resolution measures including the NOV issued to AES and SLH by the Coastal Commission, and the retention of Prop 68 funding by the City of Redondo Beach in the event of a compliance date extension of Redondo Beach.

2.4.2. Comments Regarding Purchase of Wetlands on the Redondo Beach Property

Several commenters stated that the City of Redondo Beach has actively been working towards purchasing a portion of the Redondo Beach power plant property to restore the historical wetlands and develop an open greenspace or park. Additionally, it is clear from many comments that there is community support for restoring and protecting the onsite wetlands and developing a park on the property, which is located in a densely populated area.

AES and SLH negotiated a Covenant at the time of sale of the Redondo Beach property. The Covenant entered into between AES and SLH is outside the State Water Board's authority to oversee or administer and the State Water Board was not involved in the negotiation of the Covenant. Additionally, local land use or the merits of any specific proposal for post-shutdown remediation and associated land use implications or

zoning laws are not appropriate for the State Water Board to resolve pursuant to its regulatory authority. Please see Master Response 2.1 for additional discussion.

2.5. Air Quality

This master response responds to many comments on air quality regarding the compliance date extensions in the Amendment. The majority of comments received regarding air quality were in opposition to the proposed extension of Redondo Beach. Other comments included, but are not limited to: the State Water Board not fulfilling its mission in protecting the environment; concerns regarding regional emissions and greenhouse gases in local air basins; Redondo Beach's impact on local air quality and community health, including visual and noise pollution and potential odor events, a reduction of air quality in the region, and the potential that the emissions from the OTC facilities could be major contributors to pollution in the air basins; environmental justice concerns for the communities close to these facilities; and how potential air pollution from facilities could increase vulnerability for individuals to effects of COVID-19.

2.5.1. Background

Commenters raised concerns that the State Water Board is not fulfilling its mission to protect the environment. The mission of the State Water Board is to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. Under the CWA and the Porter-Cologne Water Quality Control Act, the State Water Board and the Regional Water Boards have regulatory responsibility for protecting the water quality of nearly 1.6 million acres of lakes, 1.3 million acres of bays and estuaries, 211,000 miles of rivers and streams, and about 1,100 miles of California coastline.²⁹

Furthermore, the intent of the OTC Policy, in addition to complying with CWA section 316(b), is to ensure that the beneficial uses of the state's coastal and estuarine waters are protected while also ensuring that the electrical power needs essential for the welfare of the citizens of the state are met. The Amendment is consistent with the mission of the Water Board and the intent of the OTC Policy.

Revisions to OTC Policy compliance dates based upon non-marine impacts to local communities, including air quality, may be considered but are largely beyond the scope of the State Water Board's authority under Clean Water Act section 316(b) and the OTC Policy. Additionally, continued operation of Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach is not expected to result in air impacts greater than those reported as baseline air emissions in Section 2.6 of the 2010 Final SED.

2.5.2. Role of the CARB in the SACCWIS

To prevent disruption in the state's electrical power supply when the OTC Policy is implemented, the State Water Board convened the SACCWIS, which includes representatives from the CARB. The CARB provides guidance on issues pertaining to

²⁹ State Water Board Website. <https://www.waterboards.ca.gov/>

greenhouse gas impacts to air quality, air quality management districts, and associated air quality permits.

Local air quality management districts as well as the CARB regulate air pollutants and emissions to ensure compliance with applicable standards through issuance and enforcement of air quality permits. Three air quality management districts house active fossil-fueled OTC facilities (Monterey Bay Air Resources District (“MBARD”), South Coast Air Quality Management District (“SCAQMD”), and the Ventura County Air Pollution Control District (“VCAPCD”).

Prior to 2010, during development of the OTC Policy and at the request of State Water Board staff, the CARB contacted local air districts housing active fossil-fueled OTC facilities regarding required air quality permits and the permitting process. Since adoption of the OTC Policy in 2010, State Water Board staff has worked closely with the CARB and the local air districts, to ensure that the OTC Policy implementation is consistent with the CARB’s standards and regulations as implemented in air permits by these air districts.

2.5.3. Air Emissions: Pollutants & Greenhouse Gases

Many comments expressed concern with regional emissions of pollutants, particulate matter, and greenhouse gases near fossil-fueled OTC power facilities, including methane and carbon dioxide (“CO₂”). These air pollutants are produced as by-products when burning fossil fuels.

To establish a basis of comparison for power plant facilities, baseline emission levels were determined at the time of OTC Policy adoption for both pollutants and greenhouse gases based on emissions patterns at the facilities, as set forth in the 2010 Final SED. Baseline emissions levels are the emittance level of a facility complying with local air permits and regulations at required levels prior to the adoption of the OTC Policy in 2010.

In the 2010 Final SED, State Water Board staff compiled air emission data from 2006 for the active fossil-fueled OTC facilities using reported values obtained from the U.S. EPA Clean Air Markets database to establish baseline levels of pollutants, including CO₂ and methane. For individual pollutant outputs of each facility, please refer to the 2010 Final SED.

Baseline CO₂ emissions for the fossil-fueled OTC facilities from 2006 and the updated emissions from 2018 are shown in Table 12.^{30,31} Additionally, as seen in Table 12, there have been significant reductions in CO₂ between the operating years of 2006 through 2018.

³⁰ State Water Board. October 1, 2010. Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/policy100110.pdf

³¹ U.S. Energy Information Administration: 2018 Carbon Dioxide Emissions Calculator <https://www.eia.gov/electricity/data/emissions/>

Table 12: 2006 vs. 2018 CO₂ Emissions

Facility	2006 CO₂ Emissions (tons/yr)	2018 CO₂ Emissions (tons/yr)
Alamitos	1,179,464	722,645
Huntington Beach	777,045	215,577
Ormond Beach	293,630	129,778
Redondo Beach	422,884	209,737

The State Water Board Resolution No. 2017-0012, Comprehensive Response to Climate Change, identifies that one of the most effective ways to reduce greenhouse gases in the atmosphere is to reduce emissions sources.³² Agencies are required to consider and implement strategies to reduce greenhouse gases through 2020 (updated to 2030 in the 2017 Scoping Plan Update).³³ Water-related mitigation measures target reducing energy requirements associated with providing reliable water supplies, such as using recycled water as cooling flows in OTC facilities, and reducing the amount of non-renewable energy associated with conveying and treating water and providing adequate wastewater treatment. Additionally, statewide greenhouse gas emissions are required to reduce over time pursuant to Health and Safety Code section 38550 and Health and Safety Code section 38566.^{34,35} The Clean Energy and Pollution Reduction Act of 2015 further requires that LSEs reduce greenhouse gas emissions through the Integrated Resource Planning process.³⁶ Notably, these statutes, and the programs that are implemented to ensure that these targets are met, do not require that specific individual facilities reduce emissions. The greenhouse gas emissions reductions from these measures may be indirectly realized through reduced energy requirements. Additionally, greenhouse gas emissions generally do not have direct localized impacts; rather, they increase global atmospheric greenhouse gas levels. While increases in global atmospheric greenhouse gas levels can have local impacts, it is not possible to

³²State Water Board. Resolution 2017_0012, Comprehensive Response to Climate Change
https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/rs2017_0012.pdf

³³CARB 2017 Scoping Plan Update
https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

³⁴ AB-32 Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. Health and Safety Code Section 38550.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32
³⁵ AB-32 Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. Health and Safety Code Section 38550. Section 38566
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=38566

³⁶ SB 350, De León. Clean Energy and Pollution Reduction Act of 2015.
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350

relate one OTC facility's greenhouse gas emissions to localized climate change impacts.

The State Water Board acknowledges the environmental impacts of the OTC facilities, including their contribution to air pollution and impacts to marine life. The OTC facilities have been operating in compliance with local air quality management district permits, and emissions/greenhouse gases have reduced significantly since adoption of the OTC Policy. The OTC facilities are complying with state regulations, health and safety codes, and policy measures. If the compliance dates are extended, these OTC facilities would continue to be regulated by applicable air quality permits. Additionally, the continued operation of selected power plants for grid reliability reasons is within the original baseline and does not lead to new significant environmental impacts or a substantial increase in the severity of previously identified environmental effects.

2.5.4. Redondo Beach Air Permit Compliance and Emissions History

A number of commenters expressed concerns regarding Redondo Beach's impact on local air quality and community health with specific issues including: visual pollution, noise pollution, and potential odor events; a reduction of air quality in the region; and that the emissions from the facility could be a major contributor of pollution in the South Coast Air Basin.

Redondo Beach is operated by AES under the AES Corporation, and the property was recently sold to SLH Fund, LLC. However, in the event of a compliance date extension for Redondo Beach, AES would continue to operate the facility. AES currently holds a SCAQMD Title V Facility Permit and participates in the SCAQMD Regional Clean Air Incentives Market program for nitrogen oxide (NO_x) emissions. Title V is a federal program designed to standardize air quality permits and the permitting process for major sources of emissions across the country. Yorke Engineering evaluated Redondo Beach's air quality history on behalf of AES, and the information below provides an overview of the facility compliance and emissions data. SCAQMD and the CARB concurred with Yorke Engineering's findings regarding Redondo Beach. Section 5.6 of the Staff Report has been revised with supplemental information regarding air permit compliance for Redondo Beach.

Redondo Beach Recent Breakdowns & Deviations

Several public comments discussed events that produced black smoke and fumes from the Redondo Beach facility. AES is currently in compliance with all regional, state, and federal air quality rules, regulations, and permit conditions for their OTC facilities. AES has no outstanding NOV or notices to comply ("NTC") related to air quality. The latest NOV was issued in 2017 and the latest NTC was issued in 2016, both of which have been resolved. The NOV issued by the SCAQMD in 2017 for late equipment testing at Redondo Beach has since been rectified and settled. All NOV and Notice to Comply ("NTC") citations were related to monitoring and/or reporting requirements that did not result in the release of excess emissions from the facility into the environment.

The latest breakdown and/or deviation resulting in excess emissions was the breakdown of a fan feeding oxygen to Unit No. 6 and resulted in visible emissions (black

smoke) that occurred on July 25, 2019; the breakdown was rectified, and the event stopped in 8 minutes. This black smoke event was cited by a number of public comments, however it did not result in an NOV, and AES has not received any NOV's for excess emissions in the past 10 years.

The SCAQMD has a formal process of agency notification in the event of an unforeseen equipment breakdown or deviation from permitted operations caused by broken or malfunctioning equipment outside of an operator's reasonable control that could result in a permit excursion potentially producing visual pollution/black smoke, noise pollution, or the presence of an odor. These events are irregular occurrences, are not part of normal daily operations, and may occur upon start-up after long periods of inactivity.

In the event of a breakdown or deviation, the operator is required to immediately notify the SCAQMD of the event and potential permit excursions or releases due to the event and must immediately work on rectifying the issue. An NOV may not result from a reported breakdown or deviation if the SCAQMD determines that the operator took all reasonable steps to prevent the issue and can rectify the issue within a specified time period. If reporting is not done in a timely manner, the facility may be subject to a violation. For the smoke to become a violation, it would have to be an ongoing event for 3 minutes, monitored by someone who is certified to read smoke. If there is a breakdown, that is an "operator error" and must be reported within the hour (incident beyond their control). There would be a resulting investigation in the event of breakdown.

Redondo Beach Generating Station Emissions History

Commenters expressed concerns that facilities like Redondo Beach have caused the air pollution to worsen in the region. Additionally, commenters were concerned that pollution may have more deleterious impacts because of the topography and meteorological conditions of the region surrounding Redondo Beach.

Redondo Beach emits very few toxic air contaminants ("TACs") and those that are released are at low levels. Releases are regulated by the SCAQMD under their air permit and California Health and Safety Code Section 44360 (b) (2), the Air Toxics Hot Spots Information and Assessment Act.³⁷ The Air Toxics Hot Spots Information and Assessment Act requires facilities to do a health risk analysis every four years to determine if citizens will be exposed to any harmful pollutants. These health risk studies consider the topography of the entire basin, the potentially high-risk areas with large populations, and mobile source impacts. If a study is done more conservatively, further tests will be conducted for specific meteorological data.

Since 2000, the SCAQMD has monitored and published the air quality record in its regulated areas, including the Southwest Coastal Los Angeles County region which

³⁷ California Air Resources Board Toxic Hot Spots Information and Assessment Act (AB 2588, 1987, Connelly).

<https://ww2.arb.ca.gov/resources/documents/air-toxics-hot-spots-information-and-assessment-act-ab-2588>

Redondo Beach is located in. The SCAQMD uses specified monitoring stations throughout Southern California to collect air quality data in a variety of geographical regions. This data has been translated into a scale known as the Air Quality Index (“AQI”). The AQI assigns each measured pollutant in each monitoring region a number from 0-500 and, based on this number, assigns it one of six categories (Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, Very Unhealthy, or Hazardous) to indicate the “cleanliness” of the air with regards to that pollutant.

As of May 4, 2020, the SCAQMD’s AQI for the Southwest Coastal Los Angeles County region, which encompasses Redondo Beach, was in the “Good” category – the cleanest air index – for pollutants carbon monoxide, nitrogen dioxide (“NO₂”), fine particulate matter, and ozone. Sulfur dioxide was not measured in 2020.

Historical air quality records from the Southwest Coastal Los Angeles County Monitoring Station are available on the CARB 2016 State Implementation Plan Standard Emission Tool, which provides emissions data from 2000 forward for all air basins in California.³⁸ The Redondo Beach facility has been consistently at or below standards for each pollutant which are the strictest current standards set by either the federal or state regulatory agencies to protect public health and welfare for the past five years.

Additionally, Redondo Beach is considered a low priority health risk facility by the SCAQMD based on total facility-wide air toxic emissions from all sources. Redondo Beach is currently meeting all regional, state, and federal air standards.

Comparison of Emissions by Sector

Some commenters expressed concern that Redondo Beach has been a major contributor to pollution in the South Coast Air Basin. The CARB developed emission estimates by source sector as part of the 2016 California State Strategy for the State Implementation Plan for Federal Ozone and PM_{2.5} Standards.³⁹ Table 13 shows the 2019 industrial emissions in the South Coast Air Basin, to which Redondo Beach belongs, broken down by sector reported in tons per day (“tpd”). The data was taken from the CARB 2016 State Implementation Plan Standard Emission Tool.⁴⁰

³⁸ California Emissions Pollution Analysis Metric: 2016 State Implementation Plan – Standard Emissions Tool

<https://www.arb.ca.gov/app/emsinv/fcemssumcat/fcemssumcat2016.php>

³⁹ 2016 California State Strategy for the State Implementation Plan for Federal Ozone and PM_{2.5} Standards

<https://ww2.arb.ca.gov/resources/documents/2016-state-strategy-state-implementation-plan-federal-ozone-and-pm25-standards>

⁴⁰ Data from CARB 2016 State Implementation Plan Standard Emission Tool

<https://www.arb.ca.gov/app/emsinv/fcemssumcat/fcemssumcat2016.php>; tables were originally compiled by Yorke Engineering.

Table 13: Emissions by Sector

Sector	CO (tpd)	NO_x (tpd)	PM (tpd)	SO_x (tpd)	VOC (tpd)	ROG (tpd)
Fuel Combustion	48.4	43.1	5.8	6.2	52.5	11.3
Waste Disposal	1.1	2.5	0.4	0.6	687.2	13.9
Cleaning and Surface Coatings	0.07	0.04	1.8	0.002	102.5	41.7
Petroleum Production and Marketing	5.2	1.3	2.7	2.1	66.7	20.7
Industrial Processes	0.5	0.5	17.7	0.3	13.8	11.7
Solvent Evaporation	0	0	0.03	0	120.7	102.1
Miscellaneous Processes	56.0	14.5	194.8	0.5	45	12.8
On-Road Motor Vehicles	637.6	168.1	24.9	1.8	92.9	82.5
Other Mobile Sources	689.7	103.8	6.7	3.4	86.3	76.6
Natural Sources	243.8	4.5	26.1	2.2	20.7	137.5
Air Basin Total	1,682	338	281	17	1,425	511

Sector	CO (tpd)	NO_x (tpd)	PM (tpd)	SO_x (tpd)	VOC (tpd)	ROG (tpd)
AES Redondo Beach	1.7	0.038	0.032	0.003	0.023	0.023

When comparing the emissions of the Redondo Beach facility to the various other sectors in Table 13, it is a relatively minor contributor to air pollutant emissions in the South Coast Air Basin.

2.5.5. Ormond Beach Air Permit Compliance

Some commenters expressed environmental justice concerns regarding pollution from facilities within the region of the South Coast air basin and the potential impacts this may have on human health.

Ormond Beach is currently in compliance with all permits and regulations and has not had any violations in the past two years that have been cited as detrimental to human health. Ormond Beach did have five observations of noncompliance in 2017. The 2017 observations included four exceedances of NO_x and one exceedance of O₂. These exceedances were all found to be at Units 1 and 2, the stations with proposed OTC Policy extensions. Continued operation of Ormond Beach is not expected to result in air impacts greater than those reported as baseline air emissions in Section 2.6 of the 2010 Final SED. Additionally, the State Water Board remains committed towards reaching

established climate change goals for the State, as evidenced by resolutions 2017-0012 and 2007-0059.^{41,42}

The State Water Board's main responsibility and jurisdiction in this proceeding is to implement CWA section 316(b). Revisions to OTC Policy compliance dates based upon non-marine impacts to local communities, including air quality, may be considered but are largely beyond the scope of the State Water Board's authority under CWA section 316(b) and the OTC Policy. The State Water Board does acknowledge that disadvantaged communities often disproportionately experience environmental impacts and has revised the Staff Report to include environmental justice considerations. State Water Board Resolution No. 2017-0012 also ensures that the Office of Public Participation within the State Water Board will work with the California Office of Environmental Health Hazard Assessment to identify communities most vulnerable to climate change impacts to ensure that those communities have access to information and technical assistance. For more information please refer to the Water Board's environmental justice goals and project strategies.⁴³

2.5.6. COVID-19 Response from the CARB

A number of commenters communicated concerns that potential pollution from a facility could make individuals more susceptible to COVID-19. The CARB is ramping up its research efforts on air quality and health to better understand the effects of COVID-19. Currently, the CARB staff is collecting data on changes in air quality, traffic counts, vehicle miles traveled, and freight activity since California's COVID-19 stay-at-home orders commenced and comparing this to data from earlier months and years. The CARB is also planning to fund two health studies to assess the COVID-19 situation. For more information on these efforts and studies, please refer to Harvard's COVID-19 study on particulate matter and researcher Yaron Ogen's study on NO₂ levels contributing to COVID-19 fatality.^{44,45}

⁴¹ State Water Board. September 18, 2007. Resolution 2007-0059.

https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2007/rs2007_0059.pdf.

⁴² State Water Board. March 7, 2017. Resolution 2017-0012.

https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/rs2017_0012.pdf.

⁴³ State Water Resources Control Board. Education and Public Outreach. Environmental Justice. Update November 15, 2017.

https://www.waterboards.ca.gov/water_issues/programs/outreach/education/justice.shtml

⁴⁴ COVID-19 PM2.5 Study. Harvard University. April 24, 2020

<https://projects.iq.harvard.edu/covid-pm/home>

⁴⁵ Ogen, Yaron. Assessing nitrogen dioxide (NO₂) levels as a contributing factor to coronavirus (COVID-19) fatality. July 15, 2020.

<https://doi.org/10.1016/j.scitotenv.2020.138605>

2.6. California Environmental Quality Act (CEQA) and Other Analyses

Many comments assume that the State Water Board must analyze the environmental impacts associated with continued operations of any facility past the current compliance date pursuant to CEQA as part of approving a revision to the compliance dates in the OTC Policy. Such an analysis is not required for the reasons set forth below.

CEQA authorizes the Secretary for Natural Resources to certify that state regulatory programs meeting certain environmental standards are exempt from the majority of the procedural requirements of CEQA, including the preparation of a separate environmental impact report (“EIR”), negative declaration, or initial study. (Cal. Code of Regs., tit. 14, §15251, subd., (g).) The Secretary for Natural Resources has certified as exempt the State Water Board’s adoption or approval of standards, rules, regulations, or plans to be used in the Basin/208 Planning program for the protection, maintenance, and enhancement of water quality in California. (Cal. Code of Regs., tit. 23, §§ 3775 – 3781). This includes state policies for water quality control, including the OTC Policy. Regulatory programs are certified when they involve “the same consideration of environmental issues as is provided by use of EIR’s and negative declarations.” (Guidelines, § 15002, subd. (l).) Approval of a certified regulatory program is not specific to each decision by an agency, but rather covers a range of agency actions that may be taken pursuant to that agency’s regulatory authority covered by the certified program. The CEQA Guidelines provide for the use of a “substitute document” by State agencies with approved certified Programs. (Cal. Code of Regs., tit. 14, § 15252.)

Regulations specifying the objectives, criteria and procedures to be followed by the State Water Board in implementing CEQA, including the exclusive procedural requirements for certified regulatory programs are found in Cal. Code of Regs., tit. 23, §§ 3720, 3775.

State Water Board regulations require that Substitute Environmental Documentation (“SED”) be prepared for a certified regulatory program. Requirements for a SED include: a written report prepared for the board that contains a brief description and an environmental analysis of the proposed project; an identification of any significant, or potentially significant, adverse environmental impacts of the proposed project; an analysis of reasonable alternatives to the project; an analysis of mitigation measures that would avoid or reduce any significant, or potentially significant, adverse environmental impacts; and an environmental analysis of the reasonably foreseeable methods of compliance. (Cal. Code of Regs. tit. 23, § 3777.)

CEQA regulations further allow for an environmental analysis of “a series of actions that can be characterized as one large project and are related . . . [a]s individual activities carried out under the same authorizing or statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.” (Cal. Code of Regs., tit. 14, § 15168, subd. (a).) For subsequent activities pursuant to the same program, the agency can approve the activity as being within the scope of the project covered by the program environmental document if the agency finds that,

pursuant to CEQA Guidelines section 15162, no new effects could occur or no new mitigation would be required. (Cal. Code of Regs., tit. 14, § 15168, subd. (c)(2).)

In assessing the potential environmental impacts of adopting a proposed regulatory program such as the OTC Policy, an agency seeks to identify impacts resulting from the project, reasonable alternatives to the project, and impacts from reasonably foreseeable methods of compliance. In so doing, the agency must describe the environmental setting, defined as the “physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation is published.” (Cal. Code of Regs., tit. 14, § 15125, subd. (a).) The environmental setting “will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant.” *Id.* The State Water Board included a description of the environmental setting that encompassed all existing coastal OTC power plants in operation at the time that would be subject to the new regulatory requirements. The physical environmental conditions as they existed included impacts resulting from operation of these power plants. The environmental setting or baseline contained within the SED is used for comparison to determine whether a proposed regulatory action may result in new, significant environmental effects.

The OTC Policy established technology-based performance standards to address adverse environmental impacts from use of OTC systems and an implementation plan to address potential effects to the state’s electrical transmission system while coordinating the efforts of the State and Regional Water Boards. The OTC Policy allowed facilities to demonstrate compliance with the OTC Policy’s performance standards using one of two alternatives: Track 1, achieving reductions in intake flow rate and screen intake velocity levels; or Track 2, minimum impingement and entrainment reductions comparable to Track 1 that would be achieved through a combination of operational or structural controls, or both. Recognizing the likelihood that many fossil-fueled OTC units would achieve compliance through retirement, re-powering, or infrastructure upgrades, the State Water Board sought input from California’s energy and permitting agencies to ensure that the implementation schedule would be accomplished in an orderly and coordinated fashion to ensure grid reliability. The State Water Board chose to continue this collaborative approach by establishing the SACCWIS to assist in reviewing scheduled conversions to the BTA as established in the OTC Policy for existing power plants and periodically report to the State Water Board with recommendations on modifications to the implementation schedule, addressing potential unforeseen changes through re-assessing compliance dates. The OTC Policy, as adopted, thus included a process for revisiting compliance dates with respect to grid reliability needs and consideration of OTC Policy amendments as needed.

In 2010, the State Water Board prepared a programmatic SED for the OTC Policy, the 2010 Final SED, which included an environmental analysis of the significant impacts or potentially significant impacts of adopting the regulations described above, as well as an assessment of significant or potentially significant effects resulting from reasonably foreseeable methods of compliance with those regulations. Methods to reduce impingement mortality and entrainment that were considered as part of this analysis included: closed-cycle wet cooling systems or closed-cycle dry cooling; as well as

measures such as aquatic filtration barriers, barrier nets, intake relocation, velocity caps, variable frequency drives, seasonal operation, fine-mesh cylindrical wedgewire screens, and modified traveling screens. The State Water Board considered all relevant resource areas and analyzed whether use of the above compliance methods could result in potentially significant environmental effects relative to the environmental baseline. The analysis noted that certain impacts were difficult to accurately assess because it was not known what specific measure from among the measures listed above would be chosen by the owner or operator for each facility for final compliance with the OTC Policy.

The State Water Board described adverse impacts associated with use of cooling towers and OTC as part of the environmental setting, or baseline, in the 2010 Final SED. However, the State Water Board was not required to analyze environmental impacts associated with allowing coastal power plants to continue operating with OTC. The plants were all existing and operational at the time of OTC Policy adoption and their impacts were all within the baseline physical conditions against which the State Water Board assessed the potential environmental impacts of adopting the OTC Policy. Nor was the State Water Board required to assess what impacts would result from allowing the physical conditions in the baseline environmental setting to continue as they existed at that time for differing periods during the compliance phase-in.

Absent including a “no-project alternative” for comparison to the potential for significant impacts resulting from adoption of the OTC Policy, the State Water Board was not required to analyze the effects of allowing continued operation of the affected power generating facilities in part because the State Water Board’s authority does not extend to requiring these facilities to shut down or to shut down on any particular timeframe. The State Water Board’s authority is to require compliance with CWA section 316(b) which, as stated above, could be accomplished through repowering or other infrastructure upgrades by owners and operators of OTC power plants. The issue before the State Water Board in 2010 was whether to adopt a policy establishing intake flow rate and velocity reductions to comply with CWA section 316(b), among other related requirements, and the environmental analysis set forth in the 2010 Final SED evaluates the potential significant impacts of measures to implement these requirements.

Arguments that the State Water Board must now analyze impacts associated with continued operation of affected power facilities pursuant to CEQA fail to account for the fact that the OTC facilities are not required to shut down in order to comply with the OTC Policy. The choice to shut down in order to effectuate compliance with the OTC Policy was a decision on the part of the applicable owners and operators.

As illustrated by the project description, consideration of compliance date extensions is “within the scope of the project” covered by the programmatic SED. (Cal. Code of Regs., tit. 14, § 15168, subd. (c)(2).) Because the original project acknowledged the possibility of compliance date extensions to address grid reliability, the Amendment is within the scope of the original environmental analysis conducted in 2010.

Additionally, Health and Safety Code Section 57004 requires external scientific peer review of the scientific basis for any proposed rule, where “scientific basis” and

“scientific portions” mean “those foundations of a rule that are premised upon, or derived from, empirical data or other scientific findings, conclusions or assumptions establishing a regulatory level, standard or other requirement for the protection of the environment.” (H&S Code § 57004, subd. (a)(2). The State Water Board OTC Policy established technology-based performance standards in 2010 for owners and operators to achieve compliance with CWA section 316(b). Proposed revisions to the compliance dates in the OTC Policy do not establish a new regulatory level, standard or other requirement. Rather, revisions to the compliance deadline, as informed by SACCWIS recommendations, implement the OTC Policy provisions as adopted in 2010.

Pursuant to Public Resources Code section 21080.5, subd. (c), certified regulatory programs are not exempt from sections addressing the need for supplements or subsequent EIRs where applicable. The State Water Board thus prepared an addendum to the programmatic SED to address “some changes or additions” to the previously adopted 2010 Final SED but concludes that “none of the conditions described in section 15162 calling for preparation of subsequent EIR have occurred.” (Cal. Code of Regs., tit. 14, § 15164, subd. (a).) California Code of Regulations, title 14, section 15162 requires a subsequent EIR where:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Any new significant effects described in California Code of Regulations, title 14, section 15162 as requiring new analysis do not refer to effects considered as part of the baseline environmental setting, which comprised existing coastal power plant operation

and ongoing impacts associated with those facilities. Rather, California Code of Regulations, title 14, section 15162 refers to new significant effects of changes to the OTC Policy regulating the impingement and entrainment effects of cooling water intake structures or of any new measures or actions required to comply with the OTC Policy, as set forth more fully above. California Code of Regulations, title 14, Section 15164 provides that an addendum to an EIR or negative declaration is appropriate if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. The Amendment does not include any substantial changes to the requirements of the OTC Policy, given the clear provisions allowing for ongoing evaluation of grid reliability concerns and consideration of revisions to compliance dates in order to maintain grid reliability. Nor does the Amendment involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects resulting from OTC Policy compliance methods. Therefore, an addendum to the 2010 Final SED is appropriate. Furthermore, the addendum contained in the Staff Report complies with requirements for an addendum set forth in California Code of Regulations, title 14, Section 15164.

Comments contending that the State Water Board must analyze impacts associated with continued operation of power plants subject to the OTC Policy when revising compliance dates fail to acknowledge that these impacts are included with the baseline (environmental setting) and are not the result of adoption of the OTC Policy or of the reasonably foreseeable methods of compliance with the OTC Policy.

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Response to Comments on the Amendment to the
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716	1st District, City of Redondo Beach	Nehrenheim	Nils	Councilman
008	26th District	Allen	Ben	Senator
005	2nd District, Board of Supervisors County of Ventura	Parks	Linda	2nd District Supervisor
732	2nd District, City of Redondo Beach	Loewenstein	Todd	Councilmember
031	350 South Bay Los Angeles	Lear	Sherry	Organizer
008	66th District	Muratsuchi	Al	Assemblymember
009	66th District	Muratsuchi	Al	Assemblymember
738	Adolescent Rescue Mentoring Solution of Los Angeles	Strasters	Zach	Director of Operations
001	AES Southland, LLC	Krueger	Lisa	President of US Strategic Business Unit
002	Akin Gump on behalf of SLH Fund, LLC	Frommer	Dario	
003	Beach Cities Democrats	Detoy	Michael	President
004	Beach Cities Health District	Bholat	Michelle	Board President
744	Cal Choice	Caudle	Jason	Executive Director
007	California Coastkeeper Alliance	Kalua	Kaitlyn	Policy Analyst
006	California Manufacturers & Technology Association, California Business Properties Association, California Retailers Association	Silverthorn	Leah	Policy Advocate
011	City of Beverly Hills	Gold	Julian	Councilmember
013	City of Hermosa Beach	Armato	Stacey	City Councilmember
012	City of Hermosa Beach	Campbell	Mary	Mayor
017	City of Hermosa Beach	Fangary	Hany	Councilmember
010	City of Oxnard	Nguyen	Alexander	City Manager
014	City of Redondo Beach	Brand	William	Mayor
014	City of Redondo Beach	Webb	Michael	City Attorney

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015	City of South Pasadena	Mahmud	Diana	Mayor Pro Tem
016	City of Torrance	Furey	Patrick	Mayor
698	Coalition for Responsible Equitable Economic Development	Modrzejewski	Jeff	
712	Dynegy Moss Landing	Batte	Mike	Managing Director
018	East Bay Community Energy	Fontenot	Marie	Sr. Director of Power Resources
019	GenOn Holdings	McDevitt	Daniel	Executive Vice President and General Counsel
020	Heal the Bay	Moe	Annelisa	Water Quality Scientist
020	Heal the Bay	Pease	Katherine	Director of Science and Policy
740	Hermosa Beach City School District	Cole	Jennifer	President of the Governing Board of the Hermosa Beach City School District
727	Hermosa Beach City School District	McCall	Stephen	Clerk and Board Member
684	I Love Homeless LA	Galarza	Geovanny	Founder
696	Independent Energy Producers Association	Smutny-Jones	Jan	Chief Executive Officer
021	Indivisible South Bay LA	Mielke	Diana	
022	International Brotherhood of Electrical Workers (1245)	Stern	Hunter	Assistant Business Manager
691	Latino Educational Fund	Sanchez	Heberto	President/Founder
024	Los Angeles / Orange Counties Building and Construction Trades Council	Miller	Ron	Executive Secretary

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023	Los Angeles County Beaches and Harbor	Nafissi	Candace	Los Angeles County Beaches & Harbor Commissioner, Redondo Beach General Plan Advisory Committee Member, Redondo Beach Library Commissioner
742	Merced Irrigation District	Dragonajtys	Richard	Senior Planning Engineer
025	Monterey Bay Community Power	Habashi	Tom	
726	Northern California Power Agency	Howard	Randy	General Manager
026	Pacific Gas and Electric Company	Krausse	Mark	Director of State Agency Relations
739	Redondo Beach Unified School District	Waller	Brad	Board of Education President
028	Rescue Our Waterfront	Craig	Wayne	President
746	San Jose Clean Energy	Mitchell	Lori	Director of Community Energy
029	Sierra Club	Cook	Marcia	Chair
030	Silicon Valley Clean Energy	Padilla	Monica	Director of Power Resources
032	South Bay Cities Council of Governments, District 3	Horvath	Christian	Councilmember
695	South Bay Parkland Conservancy	Light	James	Director and Secretary
033	South Bay Parkland Conservancy	Varvarigos	Jacob	President
662	Southern California Public Power Authority	Mmagu	Amy	State Government Affairs Manager
034	Southern California Public Power Authority	Webster	Michael	Executive Director

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722	State Building and Construction Trades Council of California	Hunter	Robbie	President
685	Steam-Refrigeration-Air Conditioning-Pipe Fitters, Welders and Apprentices of the United Association of the United States and Canada	Santa Cruz	Glenn	Business Manager
035	Surfrider Foundation South Bay Chapter	Cadwallader	Craig	Policy Coordinator
671	Tabernacle of Faith Missionary	Moore	Clarence	President
215	The Family Farm Box	Savahge	Diane	Founding Chef
036	The Protect Our Communities Foundation	Dickenson	Malinda	General Counsel
036	The Protect Our Communities Foundation	Siegele	Tyson	Energy Analyst
678	Torrance Unified School District	Lee	Don	Board Member
037	Tree People	Montanez	Cindy	Chief Executive Officer
038	WHEN Foundation	Poklemba	Brooke	Fund Development Manager
051	Whitehead Engineering	Whitehead	David	Owner
673	Youth Empowered through Scholastic Sports Service	Morales	Daniel	Founder/Executive Director
687	Individual	Abramowitz	Greg	
524	Individual	Absher	Pam	
292	Individual	Affonso	Jane	
270	Individual	Ahadi	Gita	
683	Individual	Albin-Bailey	Gayle	
535	Individual	Allaf	Paul	
536	Individual	Allaf	Paul	
536	Individual	Allaf	Linda	

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708	Individual	Allen	Mark	
661	Individual	Almeida	Adam	
450	Individual	Alvarado	Maritza	
111	Individual	Andersen	Andrew	
111	Individual	Andersen	Mimi	
393	Individual	Anderson	Kelsey	
194	Individual	Andrews	Dave	
231	Individual	Ansel-Burke	Elizabeth	
337	Individual	Apoian	John	
637	Individual	Arambulo	Tina	
509	Individual	Arestegui-Hunt	Nancy	
621	Individual	Arfin	Sydney	
387	Individual	Arnold	Keith	
510	Individual	Arter	Nancy	
077	Individual	Atwell	Priscilla	
548	Individual	Avedian	Raymond	
657	Individual	Awty	William	
325	Individual	Ayton	Joan	
338	Individual	Ayton	John	
427	Individual	Azouz	Lili	
556	Individual	Azouz	Richard	
703	Individual	Bacallao	Katrina	
401	Individual	Bailey	Kim	
694	Individual	Balestra	Jackie	
376	Individual	Balg	Karl	
376	Individual	Balg	Minoo	
057	Individual	Ballard	Greg	
715	Individual	Barnes	Nicholas	
063	Individual	Barnett	John	
381	Individual	Barron	Kathy	

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085	Individual	Bartlett	Thomas	
468	Individual	Bartley	Matt	
428	Individual	Bassett	Linda	
027	Individual	Bauer	Tom	Redondo Beach Harbor Commissioner
559	Individual	Becker	Rick	
398	Individual	Bell	Kevin	
289	Individual	Belt	James	
222	Individual	Bender	Doug	
721	Individual	Benning	Ray	
242	Individual	Beresini	Erin	
615	Individual	Berger	Steven	
690	Individual	Bergsten	Hans	
311	Individual	Bevilacqua	Jennifer	
515	Individual	Bharwani	Natasha	
290	Individual	Biskey	James	
121	Individual	Blair	Anneke	
699	Individual	Blandford	John	
162	Individual	Blomer	Charles	
537	Individual	Blumenfeld	Paul	
389	Individual	Bockrath	Kelly	
208	Individual	Bolden	Demetria	
079	Individual	Bongiovanni	Ray	
079	Individual	Bongiovanni	Agnes	
084	Individual	Bongiovanni	Taylor	
611	Individual	Boodram	Stephen	
358	Individual	Borrett	Judith	
358	Individual	Borrett	Michael	
223	Individual	Boswell	Doug	
538	Individual	Boudreau	Paul	

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681	Individual	Bowman	Erik	
399	Individual	Boyle	Kevin	
653	Individual	Bradshaw	Wayne	
197	Individual	Brandin	David	
733	Individual	Brewer	Tom	
688	Individual	Broadbent	Greg	
339	Individual	Brodhead	John	
156	Individual	Broussard	Candice	
048	Individual	Brown	Dan	
386	Individual	Brown	Kay	
539	Individual	Brown	Paul	
065	Individual	Bucci	Jon	
469	Individual	Bullock	Matt	
470	Individual	Burgess	Matt	
530	Individual	Burke	Patrick	
251	Individual	Burton	G.O.	
226	Individual	Campbell	Dwayne	
426	Individual	Campeggi	Lezlie	
668	Individual	Cannon	Chris	
724	Individual	Carlson	Roger	
089	Individual	Carpenter	Aaron	
609	Individual	Carpenter	Stacy	
213	Individual	Casado	Denver	
144	Individual	Casey	Brian	
144	Individual	Casey	Janet	
391	Individual	Castro	Kelly	
594	Individual	Caudle	Sharon	
167	Individual	Chamides	Chris	
511	Individual	Chamides	Nancy	
577	Individual	Chamides	Ryan	

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Letter Number	Organization	Last Name	First Name	Title
161	Individual	Chang	Charlene	
493	Individual	Chant	Michelle	
390	Individual	Charles	Kelly	
635	Individual	Charles	Tim	
315	Individual	Charlton	Jenny	
735	Individual	Chatterji	Vish	
612	Individual	Chavez	Stephen	
612	Individual	Chavez	Erica	
154	Individual	Chelf	Camille	
061	Individual	Chen	Jim	
094	Individual	Chenfu	Aga	
143	Individual	Chipeska	Brent	
422	Individual	Chrzan	Leslie	
484	Individual	Chrzan	Michael	
360	Individual	Cianciotto	Judy	
497	Individual	Ciavarelli	Mike	
099	Individual	Clay-Duboff	Alison	
090	Individual	Clendenning	Aaron	
153	Individual	Clendenning	Catherine	
665	Individual	Clendenning	Cat	
050	Individual	Coe	David	
221	Individual	Coe	Dorothy Lee	
221	Individual	Coe	Mary Lee	
480	Individual	Cohen	Melanie	
482	Individual	Colber	Melody	
349	Individual	Cole	Jonathan	
052	Individual	Coleman	Eric	
291	Individual	Coleman	James	
614	Individual	Colin	Stevan	
541	Individual	Comeau	Paulette	

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Letter Number	Organization	Last Name	First Name	Title
184	Individual	Conrad	Kyle	
340	Individual	Conyne	John	
578	Individual	Cooper	Ryan	
474	Individual	Cooperstein	Mathew	
047	Individual	Correll	Cole	
483	Individual	Costello	Michael	
483	Individual	Costello	Carol	
705	Individual	Cotner	Lauren	
229	Individual	Covington	Elaine	
237	Individual	Cox	Emily	
341	Individual	Cox	John	
599	Individual	Coyazo	Sheila	
599	Individual	Coyazo	Joseph	
730	Individual	Craddock	Ted	
610	Individual	Crane	Stephanie	
218	Individual	Cresta	Domenica	
557	Individual	Crisa	Richard	
366	Individual	Crispell	Julie	
285	Individual	Crocker	Jac	
452	Individual	Cronkrite	Mark	
370	Individual	Cull	Karen	
370	Individual	Cull	Nick	
204	Individual	Cullen	Deborah	
204	Individual	Cullen	John	
677	Individual	Curwick	Dianne	
564	Individual	Cutts	Robert	
734	Individual	Czuleger	Tony	
210	Individual	Dangelo	Denise	
528	Individual	Dangelo	Pat	
410	Individual	Daniels	Kyle	

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718	Individual	Dank	Pamela	
326	Individual	Davidson	Joan	
351	Individual	Dean	Jordan	
271	Individual	Deckman	Glenn	
257	Individual	Dedo	Gary	
371	Individual	Dedo	Karen	
589	Individual	Delahaut	Scott	
308	Individual	Dellenbach	Jena	
680	Individual	DeLong	Douglas	
319	Individual	Desalvo	Jim	
236	Individual	DeSilva	Emilio	
274	Individual	Diete	Greg	
462	Individual	Diete	Mary Lou	
648	Individual	DiLeva	Vince	
259	Individual	Dix	Gena	
260	Individual	Dix	Gena	
312	Individual	Dodge	Jennifer	
134	Individual	Dole	Beverly	
636	Individual	Donahue	Tim	
327	Individual	Donner	Joan	
707	Individual	Downey	Lyle	
707	Individual	Downey	Sheila	
416	Individual	Doyle	Laura	
413	Individual	Duke	Lara	
307	Individual	Duncan	Donna	
207	Individual	Duran	Demarco	
310	Individual	Durand	Jennifer	
310	Individual	Durand	John	
640	Individual	Dvorak	Tom	
692	Individual	Earle	Jack	

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579	Individual	Edmundowicz	Ryan	
550	Individual	Edwards	Rebecca	
745	Individual	Edwards	Jeffrey	
580	Individual	Ehlebracht	Ryan	
160	Individual	Eichman	Chad	
219	Individual	Eiesland	Don	
595	Individual	Elenbaas	Sharon	
282	Individual	Ellman	Ira	
282	Individual	Ellman	Barbara	
361	Individual	English	Judy	
600	Individual	Ennis	Sheila	
177	Individual	Ensworth	Cindy	
125	Individual	Epstein	Barbara	
125	Individual	Epstein	Jack	
126	Individual	Epstein	Barbara	
188	Individual	Esser	Dana	
202	Individual	Esser	Dawn	
217	Individual	Esser	Dirk	
040	Individual	Eustice	Annette	
461	Individual	Ewell	Mary	
731	Individual	Faia	Thomas	
133	Individual	Fekete	Betty	
485	Individual	Fekete	Michael	
080	Individual	Fellows	Scott	
178	Individual	Felman	Claire	
234	Individual	Fenton	Emie	
605	Individual	Fernandez	Siobhan	
593	Individual	Flaherty	Shannon	
170	Individual	Flentie	Christiane	
412	Individual	Flentie	Madeleine	

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163	Individual	Force	Charles	
272	Individual	Forristall	Glenna	
658	Individual	Fortier	William	
565	Individual	Fortunato	Robert	
256	Individual	Franco	Galo	
256	Individual	Franco	Lena	
383	Individual	Frankle	Katie	
590	Individual	Frantz	Scott	
198	Individual	Frazee	David	
628	Individual	Friedman	Teri	
566	Individual	Gaddis	Robert	
414	Individual	Gaines	Larry	
330	Individual	Galliani	Joe	
039	Individual	Ganis	Amanda	
070	Individual	Ganis	Mary	
601	Individual	Garcia	Sheila	
651	Individual	Garcia	Vivian	
124	Individual	Garnier	Augustin	
124	Individual	Garnier	Jennifer	
068	Individual	Garza	Manny	
138	Individual	Gaubas	Blaise	
331	Individual	Geary	Joe	
243	Individual	Getty	Erin	
682	Individual	Getty	Erin	
659	Individual	Gibbs III	William	
093	Individual	Gleichman	Adele	
093	Individual	Gleichman	Douglas	
083	Individual	Goldstein	Steve	
453	Individual	Goldstein	Mark	
190	Individual	Gonzalez	Daniel	

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561	Individual	Good	Rob	
613	Individual	Goodell	Stephen	
643	Individual	Gorsuch	Valerie	
378	Individual	Gould	Katherine	
378	Individual	Gould	Donald	
252	Individual	Goulet	Gail	
066	Individual	Green	Jon	
118	Individual	Greenbaun	Anne	
092	Individual	Greeves	Adam	
626	Individual	Gretsky	Teresa	
646	Individual	Griffin	Vicky	
713	Individual	Griffiths	Mike	
445	Individual	Guillermo	Marcie	
332	Individual	Gunning	Joe	
447	Individual	Haase	Maria	
447	Individual	Haase	Xavier	
676	Individual	Hadley	David	
560	Individual	Hahn	Rick	
697	Individual	Hahn	Janice	
379	Individual	Hairrell	Katherine	
581	Individual	Hall	Ryan	
115	Individual	Halpin	Ann	
227	Individual	Hamilton	Edith	
415	Individual	Haneline	Laura	
415	Individual	Haneline	Bob	
109	Individual	Harris	Andrea	
417	Individual	Harris	Laura	
404	Individual	Hayes	Krista	
629	Individual	Hays-Horner	Terry	
670	Individual	Hazard	Cindy	

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Letter Number	Organization	Last Name	First Name	Title
254	Individual	Hazeltine	Gale	
305	Individual	Hazeltine	Jeff	
075	Individual	Healy	Patrick	
747	Individual	Healy	Pat	
042	Individual	Hellebuyck	Boris	
262	Individual	Henderson	George	
313	Individual	Henderson	Jennifer	
155	Individual	Herbert	Cammie	
400	Individual	Herink	Kevin	
362	Individual	Herman	Judy	
397	Individual	Herschelman	Kern	
300	Individual	Hewlett	Jay	
342	Individual	Hicks	John	
542	Individual	Hiebert	Paulette	
689	Individual	Hill	Greg	
475	Individual	Hinsley	Matthew	
335	Individual	Hirsch	Joel	
641	Individual	Hite	Tommye	
476	Individual	Hoffman	Matthew	
656	Individual	Hofto	William	
656	Individual	Hofto	Alison	
182	Individual	Holland	Cody	
456	Individual	Holmes	Martin	
642	Individual	Horowitz	Traci	
059	Individual	Horrell	Jay	
064	Individual	Hough	John	
185	Individual	Howard	Craig	
736	Individual	Howells II	Walter	
355	Individual	Hryniewicz	Joy	
557	Individual	Hzina	Josephine	

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Letter Number	Organization	Last Name	First Name	Title
281	Individual	Huckeba	Howard	
567	Individual	Hulvey	Robert	
116	Individual	Hutcherson	Ann Marie	
158	Individual	Hyneman	Caterina	
573	Individual	Iacopucci	Ron	
583	Individual	Ilkhchooyi	Sahab	
437	Individual	Imberechts	Luc	
329	Individual	Inga	Joanne	
329	Individual	Inga	Marco	
096	Individual	Israel	Alan	
179	Individual	Izakowitz	Claire	
549	Individual	Jackson	Raymond	
520	Individual	Janssen Walls	Nona	
498	Individual	Jaspersen	Mike	
714	Individual	Jeffery	Monica	
714	Individual	Jeffery	Jerry	
438	Individual	Jimenez	Luis	
105	Individual	Johnson	Amira	
207	Individual	Johnson	Austin	
294	Individual	Johnson	Janet	
317	Individual	Johnson	Jill	
645	Individual	Johnson	Vanessa	
645	Individual	Johnson	Dylan	
046	Individual	Jones	Christopher	
175	Individual	Jones	Christopher	
584	Individual	Jones	Samantha	
106	Individual	Josefek	Amy	
314	Individual	Kahn	Jennifer	
165	Individual	Kahnamoui	Cheryl	
451	Individual	Kakara	Marjorie	

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Letter Number	Organization	Last Name	First Name	Title
363	Individual	Kamp	Judy	
743	Individual	Kanyer	Elisabeth	
471	Individual	Kappadakunnel	Matt	
199	Individual	Keane	David	
157	Individual	Keen	Carly	
086	Individual	Keenan	Tim	
472	Individual	Kent	Matt	
477	Individual	Kidd	Matthew	
087	Individual	King	Tim	
295	Individual	Kirk	Janet	
382	Individual	Kirk	Kathy	
318	Individual	Klausen	Jill	
481	Individual	Kline	Melissa	
097	Individual	Knowles	Alex	
235	Individual	Kobayashi	Emiko	
235	Individual	Kobayashi	Katsumi	
263	Individual	Konstantouros	George	
183	Individual	Koopmann	Cody	
720	Individual	Kotzbach	Pete	
364	Individual	Kovisars	Julia	
512	Individual	Koza	Nancy	
543	Individual	Krajewski	Peter	
298	Individual	Kravits	Jason	
122	Individual	Kumar	Anu	
602	Individual	Lamb	Sheila	
412	Individual	Lamberson	Ali	
444	Individual	Lang	Mara	
444	Individual	Lang	Kevin	
132	Individual	Langeslay	Beth	
189	Individual	Lasdow	Daniel	

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Letter Number	Organization	Last Name	First Name	Title
189	Individual	Lasdow	Sunita	
632	Individual	Laura	Theresa	
302	Individual	Laurin	Jean	
369	Individual	Lawson	Justin	
375	Individual	Leblanc	Karine	
487	Individual	Lee	Michael	
702	Individual	Lenihan	Joseph	
110	Individual	Leon-Grossmann	Andrea	
112	Individual	Lesser	Andrew	
350	Individual	Leven	Jonathan	
419	Individual	Levine	Leanna	
286	Individual	Levy	Jack	
454	Individual	Levy	Mark	
078	Individual	Lewenfus	Rachelle	
081	Individual	Lewenfus	Sheldon	
279	Individual	Light	Harold	
572	Individual	Light	Roger	
429	Individual	Lindsey	Linda	
686	Individual	Liu	Gloria	
596	Individual	Lombard	Sharon	
568	Individual	Lopez	Robert	
647	Individual	Lupo	Vince	
647	Individual	Lupo	Amy	
616	Individual	Lurie	Steve	
546	Individual	Mackinnon	Ranald	
582	Individual	MacMurdo	Ryann	
220	Individual	Madden	Donna	
269	Individual	Magee	Gina	
630	Individual	Maggay	Terry	
439	Individual	Maggio	Luke	

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Letter Number	Organization	Last Name	First Name	Title
660	Individual	Maggio	Zoe	
663	Individual	Maher	Bill	
261	Individual	Maisto	Gennaro	
200	Individual	Makharadze	David	
187	Individual	Mandy	Dan	
359	Individual	Mango	Judith	
214	Individual	Mann	Diana	
343	Individual	Mann	John	
607	Individual	Marchese	Sondra	
585	Individual	Marchitelli	Sandra	
067	Individual	Marcon	Liz	
067	Individual	Marcon	Jeff	
435	Individual	Marino	Lois	
245	Individual	Marsh	Fabienne	
533	Individual	Mart	Patsy	
392	Individual	Martin	Kelly	
431	Individual	Martin	Lingling	
488	Individual	Martin	Michael	
586	Individual	Martin	Sara	
276	Individual	Maslanka	Gretchen	
709	Individual	Matsuno	Masami	
299	Individual	Mayerle	Jason	
193	Individual	McCarthy	Darcee	
264	Individual	McCarthy	George	
411	Individual	McCartin	Kyle	
135	Individual	McCluskey	Bill	
496	Individual	McCraley	Mike	
496	Individual	McCraley	Marla	
293	Individual	McDowall	Jane	
139	Individual	McEachen	Bob	

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Letter Number	Organization	Last Name	First Name	Title
513	Individual	McEville	Nancy	
344	Individual	McGanty	John	
041	Individual	McKaig	Bill	
634	Individual	McPherson	Tiki	
693	Individual	McSweeney	Jack	
240	Individual	Melahn	Erika	
152	Individual	Melia	C. Jayne	
228	Individual	Melia	Edward	
060	Individual	Melodia	Jeff	
201	Individual	Merager	David	
212	Individual	Michaud	Dennis	
076	Individual	Migliorini	Patrick	
304	Individual	Miller	Jeanne	
074	Individual	Mintz	Nathan	
700	Individual	Mirassou	John	
354	Individual	Mlynarski	Josh	
053	Individual	Mlynek	Gary	
654	Individual	Mogilefsky	Wayne	
423	Individual	Mohr	Leslie	
460	Individual	Mollenkamp	Mary Ann	
320	Individual	Montgomery	Jim	
372	Individual	Montgomery	Karen	
054	Individual	Moore	Gary	
247	Individual	Morales	Francisco	
247	Individual	Morales	Teresa	
544	Individual	Morrow	Peter	
719	Individual	Moses	Paul	
649	Individual	Mrstik	Vincent	
191	Individual	Mullilgan	Daniel	
058	Individual	Munns	Harry	

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Letter Number	Organization	Last Name	First Name	Title
728	Individual	Murdoch	Steve	
666	Individual	Murphy	Cee-Cee	
666	Individual	Murphy	Danny	
408	Individual	Murray	Krystin	
489	Individual	Murray	Michael	
631	Individual	Muzik	Thelma	
463	Individual	Myers	Mary	
246	Individual	Nabavi	Famararz	
280	Individual	Nafissi	Hooman	
622	Individual	Namay	Tamara	
503	Individual	Nash	Miriam	
284	Individual	Nawfal	Ismael	
604	Individual	Naz	Sheraz	
706	Individual	Neal	Linda	
232	Individual	Neat	Elizabeth	
209	Individual	Nelson	Dency	
209	Individual	Nelson	Moira	
506	Individual	Nelson	Moira	
534	Individual	Nernberg	Patti	
356	Individual	Neu	Joyce	
479	Individual	Nevil	Meg	
516	Individual	Newman	Nelda	
224	Individual	Nielson	Doug	
504	Individual	Noble	Misty	
388	Individual	Noguchi	Kelli	
499	Individual	Noguchi	Mike	
196	Individual	Nojima	Stephanie	
196	Individual	Nojima	David	
442	Individual	Nwankwo	Maani	
230	Individual	Nye	Elisa	

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Letter Number	Organization	Last Name	First Name	Title
049	Individual	Nyznyk	Darryl	
529	Individual	O'Brien	Patricial	
618	Individual	O'Brien	Steven	
267	Individual	O'Connor	Gerry	
424	Individual	Ogg	Leslie	
055	Individual	O'Hagan	Gerald	
119	Individual	O'Halloran-McKeown	Anne	
044	Individual	Olsen	Carol	
275	Individual	Olson	Greg	
432	Individual	Olson	Lisa	
266	Individual	Orcholski	Gerald	
384	Individual	Oreste	Katie	
407	Individual	Pace	Kristy	
043	Individual	Palicke	Carl	
136	Individual	Palmatary	Bill	
287	Individual	Pan	Jack	
321	Individual	Parker	Jim	
082	Individual	Parris	Steve	
082	Individual	Parris	Diane	
652	Individual	Paul	Warren	
672	Individual	Paul	Colette	
517	Individual	Pavach	Nicholas	
405	Individual	Pavlik	Kristine	
638	Individual	Pavlik	Todd	
725	Individual	Peterson	Sarah	
418	Individual	Petros	Laura	
145	Individual	Pettigrew	Brian	
164	Individual	Phillips	Charles	
322	Individual	Phillips	Jim	
467	Individual	Pianin	Matt	

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Letter Number	Organization	Last Name	First Name	Title
467	Individual	Pianin	Rachel	
588	Individual	Pilla	Sarah	
249	Individual	Pinczuk	Fred	
430	Individual	Pinkham	Lindsay	
117	Individual	Pitts	Ann	
056	Individual	Polk	Gerald	
307	Individual	Pool	Jeffrey	
525	Individual	Popovich	Pamela	
140	Individual	Powell	Bob	
141	Individual	Price	Bonnie	
575	Individual	Pringle	Ronald	
425	Individual	Prizant	Leslie	
069	Individual	Provenzano	Marcus	
701	Individual	Pujol	John	
268	Individual	Pupa	Giada	
268	Individual	Pupa	William	
674	Individual	Quisenberry	Daniel	
373	Individual	Quissell	Karin	
394	Individual	Raef	Ken	
655	Individual	Raleigh	Will	
627	Individual	Rankin	Teresa	
617	Individual	Rapone	Steve	
558	Individual	Raynor	Richard	
250	Individual	Reardon	Frederick	
333	Individual	Rebs	Joe	
644	Individual	Reid	Valerie	
551	Individual	Reines	Rebecca	
619	Individual	Rengo	Susan	
073	Individual	Reynolds	Mike	
073	Individual	Reynolds	Stacey	

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Letter Number	Organization	Last Name	First Name	Title
328	Individual	Riley	Joan	
406	Individual	Rinehart	Kristopher	
255	Individual	Riss	Galila	
597	Individual	Riss	Sharon	
146	Individual	Ritter	Brian	
569	Individual	Ritter	Robert	
296	Individual	Ritterspach	Janet	
669	Individual	Rizzoni	Christina	
490	Individual	Rochmes	Michael	
102	Individual	Rogers	Amanda	
159	Individual	Ronan	Catherine	
248	Individual	Ronkowski	Fred	
248	Individual	Ronkowski	Ely	
633	Individual	Rooney	Thomas	
142	Individual	Roper	Boyd	
091	Individual	Rose	Aaron	
104	Individual	Rose	Amelia	
704	Individual	Rosolowski	Larry	
367	Individual	Roukos	Julie	
478	Individual	Rozensher	Maytal	
603	Individual	Russell	Shelby	
620	Individual	Ryan	Susan	
433	Individual	Ryder	Lisa	
127	Individual	Sabo	Barbara	
486	Individual	Sachs	Michael	
521	Individual	Sagisi	Nunila	
448	Individual	Salaverri	Maria	
306	Individual	Salvayrn	Jeff	
238	Individual	Sandersfeld	Emily	
464	Individual	Sankus	Mary	

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Letter Number	Organization	Last Name	First Name	Title
203	Individual	Sanowski	Debbie	
395	Individual	Sarno	Kenneth	
623	Individual	Saunt	Tammy	
420	Individual	Schantz	Lea Ann	
258	Individual	Scharfenberger	Gemma	
345	Individual	Schattinger	John	
365	Individual	Schellenbaum	Julianne	
409	Individual	Schmalz	Kurt	
265	Individual	Schmeltzer	George	
151	Individual	Schmirler	Brynnan	
239	Individual	Schmirler	Eric	
368	Individual	Schmirler	Julie	
519	Individual	Schmirler	Nolen	
323	Individual	Schoen	Jim	
181	Individual	Scholnick	Cliff	
181	Individual	Scholnick	Mercedes	
385	Individual	Schonbachler	Katie	
507	Individual	Schonbachler	Muriel	
130	Individual	Schutz	Basia	
347	Individual	Schwalbach	Jon	
168	Individual	Schwartz	Chris	
500	Individual	Schwartz	Mike	
449	Individual	Scolinos	Mariann	
071	Individual	Scott	Matt	
253	Individual	Scott	Gailmarie	
545	Individual	Scott	Rachel	
555	Individual	Scott	Ric	
441	Individual	Sedey	Lynne	
526	Individual	Sellars	Pamela	
225	Individual	Semenjuk	Drina	

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Letter Number	Organization	Last Name	First Name	Title
598	Individual	Sexton	Shaun	
598	Individual	Sexton	Lenae	
107	Individual	Sharp	Andre	
592	Individual	Sharp	Seena	
113	Individual	Shelby	Andy	
562	Individual	Sherwood	Rob	
128	Individual	Shigekuni	Barbara	
501	Individual	Shockley	Mike	
211	Individual	Shor	Denise	
172	Individual	Shultz	Christine	
531	Individual	Shuss	Patrick	
574	Individual	Siegel	Ron	
553	Individual	Silk	Renee	
465	Individual	Simun	Mary	
457	Individual	Slack	Martin	
309	Individual	Sleefe	Jenna	
131	Individual	Sloan	Ben	
737	Individual	Smith	Wilson	
458	Individual	Snider	Martin	
624	Individual	Soilbelman	Tania	
244	Individual	Solomon	Eugene	
103	Individual	Sommerfeld	Amanda	
100	Individual	Sorensen	Alison	
711	Individual	Souther	Michele	
278	Individual	Soydan	Haluk	
377	Individual	Spalding	Karly	
540	Individual	Specterman	Paul	
297	Individual	Spessert	Janet	
137	Individual	Spice	Bill	
625	Individual	Spice	Tasha	

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Letter Number	Organization	Last Name	First Name	Title
062	Individual	Sprott	Jo Ann	
336	Individual	St.Rock	John	
336	Individual	St.Rock	Heather	
101	Individual	Stansbury	Allan	
149	Individual	Steele	Bruce	
149	Individual	Steele	Teresa	
241	Individual	Steinberger	Robb	
241	Individual	Steinberger	Erin	
563	Individual	Steinberger	Robb	
180	Individual	Stevens	Claire	
491	Individual	Stewart	Michael	
587	Individual	Stewart	Sara	
348	Individual	Stier	Jon	
186	Individual	Stone	Daisy	
505	Individual	Stover	Mitzi	
473	Individual	Strawn	Matt	
518	Individual	Strosaker	Nicole	
273	Individual	Suddeth	GP	
171	Individual	Sullivan	Christina	
301	Individual	Surber	Jaysen	
352	Individual	Symond	Joseph	
679	Individual	Szerlip	Donald	
421	Individual	T	Lee	
334	Individual	Tait	Joe	
729	Individual	Takemoto	Steven	
522	Individual	Taner	Orhan	
173	Individual	Tasto	Christine	
667	Individual	Tchir	Cheryl	
205	Individual	Teel	Deborah	
123	Individual	Telles	April	

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Letter Number	Organization	Last Name	First Name	Title
552	Individual	Thompson	Reed	
374	Individual	Thomson	Karen	
353	Individual	Tillotson	Joseph	
120	Individual	Timmer	Anne	
650	Individual	Tipaldo	Vincent	
176	Individual	Tipton	Chuck	
570	Individual	Titus	Robin	
357	Individual	Topping	Joyce	
098	Individual	True-Daniels	Alisa	
072	Individual	Ude	Michael	
095	Individual	Umemoto	Akira	
446	Individual	Urrutia	Margarita	
639	Individual	Valdez	Tom	
639	Individual	Valdez	Linda	
108	Individual	Van Heerden	Andre	
741	Individual	Vaningen	Linda	
129	Individual	Varon	Barbara	
206	Individual	Vechi	Delia	
316	Individual	Verenkoff	Jill	
316	Individual	Verenkoff	Pete	
192	Individual	Vindez	Danielle	
200	Individual	Vitale	Anna	
045	Individual	Voisey	Chris	
088	Individual	Wainwright	Vince	
195	Individual	Waldner	Dave	
502	Individual	Walker	Mike	
216	Individual	Wallace	Diane	
396	Individual	Waller	Kenneth	
169	Individual	Walmer	Chris	
664	Individual	Walsh	Carl	

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Letter Number	Organization	Last Name	First Name	Title
233	Individual	Wang	Elizabeth	
571	Individual	Wang	Robin	
402	Individual	Warden	Kimiko	
494	Individual	Waters	Michelle	
492	Individual	Webb	Michael	
288	Individual	Weissman	Jackie	
303	Individual	Welch	Jean	
459	Individual	Welch	Martin	
710	Individual	Wermers	Michael	
466	Individual	Wheeler	Mary	
527	Individual	Whit	Pamela	
547	Individual	White	Randall	
324	Individual	Whitfield	Jim	
532	Individual	Wickens	Patrick	
174	Individual	Wilkas	Christine	
508	Individual	Wilson	Nan	
443	Individual	Winter	Majcha	
514	Individual	Winters	Nancy	
723	Individual	Wolfe	Robert	
114	Individual	Wolfson	Ann	
114	Individual	Wolfson	Brian	
403	Individual	Woods	Kris	
166	Individual	Wright	Cheryl	
591	Individual	Wright	Scott	
283	Individual	Yamazaki	Irene	
576	Individual	Yosnow	Ross	
434	Individual	Youngworth	Lisa	
150	Individual	Yudko	Bryan	
455	Individual	Zamites	Marlene	
436	Individual	Zaremski	Lori	

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Letter Number	Organization	Last Name	First Name	Title
148	Individual	Zaun	Brooke	
346	Individual	Zelasko	John	
495	Individual	Zelasko	Michelle	
440	Individual	Zino	Lynn	
147	Individual	Zirbel	Brian	
675	Individual		Dave	
277	Individual		haichi2001@gmail.com	
380	Individual		Kathleen	
523	Individual		Orion XN	
717	Individual		Pamela	
554	Individual		RH	
606	Individual		SlamminHammer	
608	Individual		SQTrinh	

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Response to Comments on the Amendment to the
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Tables and figures have been excluded from the following comment matrix for accessibility purposes, and can be found in comment letters available online by request.

Letter and Comment Number	Comment	Response
001.01	All the AES OTC Plants provide important reliability services to the Los Angeles basin local area.	Comment noted. Please see Master Response 2.2.
001.02	For the reasons discussed in these comments and in our presentation to the Water Board at the April 21, 2020 workshop, <i>AES Southland urges the Water Board to approve <u>Alternative 2 from the January 20, 2020 SACCWIS Report (the “SACCWIS Report”)</u>, which provides three year extensions for Alamitos, Huntington Beach, Redondo Beach and Ormond Beach Generating Plant (“Ormond Beach”) through 2023 to ensure electric reliability while protecting human health and the environment.</i>	<p>Comment noted. Please see Master Response 2.2. Additionally, as noted in the January 2020 SACCWIS Report, Alternative 2 would maximize existing OTC resource capacity available to meet reliability needs as 3,300 MW of new capacity comes online pursuant to CPUC Decision (D.) 19-11-016.^{1,2} However, some stakeholders have argued that Ormond Beach and Redondo Beach in particular have harmful impacts on local communities and extensions of these facilities may interfere with existing plans for redevelopment of the associated properties.</p> <p>Based on the additional information together with the recommendations provided in CPUC Decision D.19-11-</p>

¹ Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS). January 23, 2020. Statewide Advisory Committee on Cooling Water Intake Structures Final Recommended Compliance Date Extensions for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations.

https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/sacccwis/docs/final_report.pdf.

² California Public Utilities Commission (CPUC). November 7, 2019. Decision Requiring Electric System Reliability Procurement for 2021-2023. <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M319/K825/319825388.PDF>.

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Letter and Comment Number	Comment	Response
		016, the SACCWIS recommended that the State Water Board consider Alternative 4, which is responsive to supporting system-wide grid reliability concerns while partly addressing community concerns. The SACCWIS also recognized that Alternative 3, which is based on the CPUC’s D.19-11-016, would address system-wide grid reliability needs. The SACCWIS did not put forth Alternative 1 or Alternative 2 as a recommendation to the State Water Board.
001.03	<p>As the state transitions to a 100% clean energy future and makes progress toward statewide climate goals, it is extremely important to maintain the safe and reliable operation of the grid. In the near-term, generating resources like the AES OTC Plants are needed to balance the instantaneous changes to supply and demand, making sure the lights stay on in California.</p> <p>For decades, the OTC coastal units were the workhorses of the energy system and provided safe, reliable energy to meet California’s needs. In recent years, the OTC Units have played an important role for electricity reliability, being available to provide ramping energy for those few hours when they are needed to balance the instantaneous changes to supply and demand or to operate at their full capacity during peak</p>	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
	<p>periods. These units are relied on to keep the lights on for those few days or weeks during the year when the state faces emergency circumstances, like wildfire outages, unavailability of intermittent renewable resources, super peak usage periods, limited hydro availability, or during periods of limited energy imports and transmission line congestion.</p>	
001.04	<p>While AES invests in new renewable energy resources and battery energy storage systems to meet California’s energy needs, we are also committed to supporting safe and reliable operation of the grid by keeping these OTC Units available as we all work to transition to a sustainable energy future. At the same time, we will continue with our plans to transition precious coastal property to beneficial redevelopments, like public open space, wetlands restoration, park land, or other uses that benefit the local community when the land is no longer needed for power plant operations.</p> <p>For these reasons and other important reasons discussed below, AES Southland urges the Water Board to adopt Alternative 2 of the SACCWIS Report, and approve 3-year extensions for the Alamitos, Huntington Beach, Redondo Beach and</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.4, as well as response to comment 001.02.</p>

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Letter and Comment Number	Comment	Response
	Ormond Beach OTC plants (collectively, the “OTC Plants”).	
001.05	<p>AES acquired the Alamitos, Huntington Beach, and Redondo Beach power plants from SCE in 1998, following deregulation of the California electricity market in 1996. AES has been the only owner of these facilities since they were divested by SCE. When the OTC Policy was originally adopted in 2010, the AES OTC Plants had a total of 14 operating units that used OTC technology. All 14 units had the same, original December 31, 2020 OTC compliance date. Half of these units have already been retired, ahead of their required compliance date as shown below.</p> <p>These retirements, before the OTC mandated compliance date, allowed California to reduce total potential marine impacts early thus accelerating the environmental benefits of the Policy.</p>	Comment noted.
001.06	The seven units which remain are all located within the Los Angeles (LA) basin local reliability area, more specifically in the heavily congested western sub-area of the LA basin. Having these units available through 2023 means they can be called on to operate at minimum load to provide	Please see Master Response 2.2.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>important ramping energy when renewable generation drops off when the sun goes down, clouds pass by or the wind stops blowing or they can operate at full capacity during times of peak demand. Dispatchable natural gas-fired power plants like the OTC Units are necessary and well suited to provide this type of service. Even though these units operate at less than 3% of the available capacity per year, they play an extremely important role to help balance the instantaneous changes to supply and demand and to operate at their full capacity during peak energy usage periods.</p>	
001.07	<p>Based on the August CAISO recommendation and almost immediately following the CPUC November 2019 Final Decision in its IRP proceeding (D.19-11-016) recommending extensions of the OTC Plants, AES Southland began receiving inquiries from LSEs for our RA capacity from the AES OTC Plants.</p> <p>Interested buyers included utilities, large aggregate CCAs, Commercial and Industrial</p>	<p>Please see Master Response 2.2. Furthermore, the CPUC acknowledged potential electricity system resource adequacy shortages beginning in 2021 in D.19-011-016, and it is for this reason that OTC compliance date extensions were recommended. This recommendation was upheld in the March 2020 CPUC D.20-03-028.³ Additionally, the Amendment is reflective of the need for OTC power to maintain grid reliability. Alternative 4 in the Staff Report, which was adopted by the SACCWIS in the January 2020 SACCWIS Report,</p>

³ CPUC. March 26, 2020. 2019-2020 Electric Resource Portfolios to Inform Integrated Resource Plans and Transmission Planning. <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M331/K772/331772681.PDF>.

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	<p>("C&I") customers, independent CCAs, as well as renewable operators with RA shortfalls due to reductions in their net qualifying capacity ("NQC"). Furthermore, these buyers are contracting for contingent OTC RA in <u>advance</u> of a formal OTC extension being granted by the Water Board and the buyers are accepting the approval risk of the OTC extension.</p> <p>In its November 2019 Decision in the IRP proceeding, the CPUC considered CAISO forecasts and their own market information to evaluate electrical system reliability, clearly indicating OTC units were needed to provide RA capacity for the system to keep the lights on during emergencies or super peak energy usage.</p> <p>Although the CPUC was working from forecasts from the California Energy Commission ("CEC") and the CAISO and trying to look ahead to ensure a reliable mix of supplies, they rightly stated that an important factor in determining actual electric system needs is the market activity when utilities, CCAs and other LSEs go into the market to procure needed RA to serve their own end-use electricity customers such as residents and businesses. In D.19-11-016, the CPUC stated:</p>	<p>would ensure the availability of capacity for contracting during peak months and could simplify contracting efforts by aligning with RA requirements and procurement timelines. This alternative is also responsive to the energy needs identified by the SACCWIS and is unanimously supported by the energy agencies in the SACCWIS in their May 2020 Joint Energy Agency Letter. Additionally, the State Water Board has received comments from the mayors of the City of Redondo Beach and the City of Hermosa Beach, as well as a significant number of comments which expressed opposition to an extension of Redondo Beach's OTC Policy compliance date. While a three-year extension of Redondo Beach would maximize OTC resource capacity available, this option was not recommended by the SACCWIS in its adoption of the January 2020 SACCWIS Report. Furthermore, new procurement and energy resources presently under development are expected to reduce the reliance on existing OTC resources in coming years.</p>

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	<p><i>The existing annual system and multi-year resource adequacy requirements will continue to include a need for existing resources, including OTC resources, to meet individual LSE resource adequacy requirements. This will help ensure that OTC resource procurement is considered alongside the expected commercial online dates of new resources that the LSEs will be procuring to meet resource adequacy needs.</i></p> <p><i>Therefore, we will look to the resource adequacy market to help determine which, how much, and for how long the OTC units will need to be contracted (provided the extensions are approved by the Water Board), with the expectation that this will result in the right amount of procurement and time needed for these units.” (CPUC D.19-11-016, p. 23; emphasis added)</i></p> <p>RA capacity is purchased in California in a wholesale “bilateral” market, which means directly between the sellers such as OTC Unit owners and the entity required to buy energy for its customers, LSEs. In California, such entities can be a private utility (“IOU”) like SCE, a publicly owned utility (“POU”), like Merced Irrigation District or the Sacramento Municipal Utility District, or a</p>	

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	<p>community choice aggregator, like Clean Power Alliance in Los Angeles County. In addition, generators may buy or sell RA to each other to meet performance requirements which they must guarantee.</p> <p>This year, the RA market in California, both within the CAISO and with POU's and Irrigation Districts that have CAISO import needs, has been unusual and extremely active, demonstrating a strong demand for OTC Units. OTC contingent buyers are from all over the state and they are contracting for multi-year terms (2021-2023).</p>	
001.08	<p>As of the date of this filing, all three of the AES OTC Plants, including Redondo Beach, have contracted with LSEs to supply RA through 2023, subject to Water Board extensions. The buyers understand and accepted the risk that the AES OTC Units are currently scheduled to be shut down by December 31, 2020 unless extensions are authorized by the Water Board. Multiple LSEs still moved forward to secure the OTC-contingent RA, depending on the Water Board extensions to allow them to meet the needs of the residents and businesses they serve.</p> <p>Alamitos, Huntington Beach and Redondo Beach</p>	<p>Comment noted. Please see Master Response 2.2 and response to comment 001.07. The State Water Board's primary responsibility and jurisdiction is to implement CWA 316(b) and ensure the beneficial uses of the State's coastal and estuarine waters are protected, while also ensuring that the electrical power needs essential for the welfare of the citizens of the State are met. The actions of the SACCWIS, including its adoption of the January 2020 SACCWIS Report, and the resulting Amendment are consistent with the mechanisms set forth in the OTC Policy to address grid reliability concerns.</p> <p>Additionally, neither the CPUC nor the State Water</p>

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	<p>are already 100% contracted through 2022, and 85% of the available AES OTC capacity is under contract through 2023. AES has historically sold OTC RA capacity on an annual basis and later in the year; however, the market interest has been significantly greater this year by a variety of buyers and for longer terms. Binding RA contracts for the capacity have been executed or are pending execution. AES expects to have the entire Southland portfolio under contract through 2023 prior to a final decision by the Water Board. For example, Merced Irrigation District (“MID”), East Bay Community Energy Authority, City of San José, and Silicon Valley Clean Energy Authority are contracted with the Redondo Beach plant through 2023 for OTC-contingent RA to meet their RA requirements and support grid reliability while providing affordable electric service to their customers, including residents and businesses. The MID letter confirming the contracting is attached as Exhibit A. Additional documentation regarding the contracting can be provided to the Water Board upon request.</p> <p>The table below shows that in just the first few months of this year, the AES OTC Units were sold to a diverse set of customers:</p>	<p>Board is party to negotiations between AES and LSEs that purchase RA from AES, and cannot advocate for or against particular contracts. Additionally, the inability of an LSE to meet RA requirements does not automatically create shortfalls in system reliability.</p>

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	<p>Locations of the above customers buying RA capacity from the AES OTC Units through 2023 include:</p> <ul style="list-style-type: none"> • Los Angeles County / South Bay (including Redondo Beach area) • Multiple Southern California Counties • San Joaquin and Central Valley • Northern California Coast • East San Francisco Bay Area • Riverside Area -San Gabriel Valley <p>This level of market activity is a clear indication that three-year extensions for all AES OTC Plants are needed to support the safe and reliable operation of the grid and serve the energy needs of California. The AES OTC Plants are contracted through 2023, as discussed above. The Ormond Beach agreement with SCE for the same three-year period (2021-2023) has been filed at the CPUC for approval by the full Commission. Therefore, all of the OTC Plants have already been contracted to LSEs such as utilities or CCAs through 2023 to serve customers statewide.</p>	
001.09	Should the Water Board not authorize the three-year extension for all OTC Plants, the utilities or CCAs who contracted for OTC contingent RA	Comment noted. Please see Master Response 2.2. The process for contracting for RA is outside of the scope of

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	must attempt to acquire replacement RA in a market with less available supply which will surely adversely impact price.	the Amendment.
001.10	<p>AES Southland recommends the Water Board take into consideration the following insights from recent market activities, all of which support the conclusion that three-year extensions are warranted for all four OTC Plants:</p> <p><u>Smaller Independent CCAs will likely be most impacted by a reduction in OTC RA supply.</u> Based on our experience, the first movers to acquire OTC contingent RA were the California utilities and larger aggregate CCAs. C&I LSEs quickly followed. Independent CCAs who usually procure during the summer months to meet their following year obligations have only recently become active in the market seeking additional RA supply for their 2021, 2022, and 2023 compliance requirements. The limited remaining supply could drive up RA pricing for the smaller, independent CCAs or those who delayed procurement decisions.</p> <p><u>Northern LSE’s are also likely to be significantly impacted by a reduction in OTC RA supply.</u> Most of AES Southland’s OTC RA capacity was</p>	<p>Comment noted. Please see Master Response 2.2. as well as responses to comments 001.07 and 001.08.</p> <p>It should be noted that there are presently no regulations that require LSEs to procure RA at a particular point in the year, and the procurement requirements that CPUC issues in July and September do not preclude LSEs from estimating new procurement needed at other periods in the year.</p> <p>Furthermore, RA waiver requests are reviewed as needed, and waivers may be granted if it appears that an LSE made reasonable efforts to procure local RA based on their requirements on a case-by-case basis. Furthermore, LSEs are subject to requirements and enforcement actions, including associated penalties incurred, by the CPUC pursuant to its authority, and the State Water Board does not have the authority or jurisdiction to regulate such requirements or enforcement actions.</p>

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	<p>procured early for local needs in the LA Basin by Southern California LSE's whereas the original expectation by CAISO and the CPUC was that the additional OTC RA capacity was needed at the system level. Later buyers located in Northern California will likely be most impacted if all four OTC Plants do not receive three-year extensions. Continued market activity indicates there are several CCAs that still must meet their upcoming October 2020 compliance showing requirements.</p> <p><u>There appears to be limited non-OTC RA supply available in the market.</u> Buyers have been willing to pay the same or very nearly the same price for OTC-contingent RA (which requires an OTC extension by the Water Board) as they would pay for standard RA. Because the risk is obviously higher for OTC-contingent RA, it is clear that buyers have concerns regarding the availability of RA to meet their compliance obligations through 2023. An OTC extension of less than three years for Redondo Beach or any of the other three OTC power plants may leave LSE's with an obligation to obtain replacement RA with very little time and limited supply available, since they have already contracted for OTC-contingent RA. This could potentially lead to a significant price spike for RA capacity in 2021, 2022, and 2023, above already</p>	

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	historically high prices. In addition, if LSEs are unable to procure RA due to limited supply, they (and their customers) could be exposed to higher prices due to backstop procurement costs and non-compliance penalties. If LSEs are unable to obtain RA and are not granted a waiver, the CAISO may need to buy backstop capacity and the CPUC could levy additional penalties on the LSE for failure to obtain sufficient RA to meet their obligations.	
001.11	LSEs (e.g., PG&E, Edison, CCAs) inside the CAISO service territory are competing in the market against each other and other LSEs for system RA capacity. As was noted by the CPUC last year in their review of RA availability, the best market dynamics to keep prices low are to have a broad market with enough supply. If the Water Board restricts the OTC units by limiting the extensions to less than three years for all OTC Plants, this will restrict supply and have an impact on the price of RA for LSEs and therefore their customers, which include homes and businesses.	Comment noted. Please see Master Response 2.2 and responses to comments 001.07, 001.08, and 001.10.
001.12	Utilities are already struggling to manage COVID-19 financial impacts with major industrial and commercial customers shut down. Restricting the resources available to meet RA needs will likely	Comment noted. Please see Master Response 2.2 and responses to comments 001.07, 001.08, and 001.10. Additionally, OTC resources may appear less expensive in RA contracts than newer, less depreciated resources.

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	result in higher RA prices. Additionally, existing units, such as the OTC units, tend to be lower cost RA resources, as they are older and more fully depreciated, and generally cost less than the price of RA for new resources.	However, the marginal costs of operating older OTC resources is higher compared to newer resources, which generally relegates them to less frequent dispatch by CAISO. ⁴
001.13	Extending the OTC dates to 2023 for all four OTC Plants allows for a broader market supply, keeping electric costs lower at a time when many electric utilities and LSEs are struggling from COVID-19 stay at home financial impacts.	Comment noted. Please see Master Response 2.2.
001.14	As discussed below, having all four OTC Plants available provides an important “insurance policy” against both known and reasonably foreseeable risks to electric system reliability. Last year, the California Public Utilities Commission (“CPUC”) began to evaluate the California Independent System Operator (“CAISO”) electric system needs due to the OTC Units scheduled to retire at the end of 2020 and raised a number of important system reliability and market impact issues. Their analysis is built on fixed assumptions for a wide range of variable resources, and thus might be under-estimating system capacity need	Comment noted. Please see Master Response 2.2 for a description of the relationship between uncertainty and the proposed OTC Policy amendment, including an analysis of the impact of COVID-19. Uncertainty regarding grid reliability was taken into account by the SACCWIS in its adoption of the January 2020 SACCWIS Report.

⁴ CPUC. May 27, 2020. Extension of Once-Through Cooling Policy Compliance Deadlines.

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	<p>considering market uncertainties. The key parameters that can lead to changes in the estimated resource need include variations in demand patterns, solar generation, wind generation, resource outages, transmission outages, rainfall, etc.</p> <p>The current mitigation plan to phase out the OTC Plants relies heavily on assumptions for near-term procurement and construction of new resources over 2020 to 2023. This plan needs to be further examined considering the impacts of COVID-19, which were entirely unknown and unforeseeable when the CPUC undertook its analysis and the SACCWIS made its recommendation. Key scenarios to consider include delays in development and procurement activities, import constraints due to fires or other transmission outages, unexpected gas retirements, surge in demand post COVID-19, etc. Other potential policy changes loom, as well, adding further uncertainty to new clean energy projects in California. These include potential new tariffs affecting the power sector and a split roll property tax initiative that has qualified for the California ballot in November that could increase tax rates on commercial property, potentially affecting the economics of new solar and other clean energy</p>	

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	<p>projects. Analysis of multiple scenarios would be useful to identify capacity need under constrained cases, which could further increase the importance of having all the OTC Plants available through 2023 to serve as a critical and cost-effective insurance policy against future brownouts and blackouts.</p>	
001.15	<p>Nothing has changed to mitigate these potential shortfalls in the years 2021 to 2023. In fact, new information shows it is even more important to extend the compliance date for all OTC Plants for three years.</p> <p>The peak energy uses continue to shift to later in the day and later in the year, reducing the reliability contributions of intermittent solar resources. Net qualifying capacity values have similarly shifted with this shifting peak. During summer peaks, California remains a “net importer” of power and as the rest of the Western United States gains population and deploys battery energy storage systems to capture excess renewable generation, the level of imports available to buoy California’s system remain uncertain. Finally, the possibility of unanticipated retirements of aging and economically distressed units unable to serve the greater Southern</p>	<p>Comment noted. Please see Master Response 2.2 and responses to comments 001.10 and 001.14.</p>

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	<p>California region remain high. Even if all OTC Plants are granted extensions, unanticipated maintenance events could result in forced early retirements and reduce available resources.</p> <p>The CPUC’s November 7, 2019 Decision (D.19-11-016) in the Integrated Resource Planning proceeding unambiguously identifies the need for keeping the OTC Units available as an important insurance policy for electric reliability:</p> <p><i>The Commission should act now to forestall a potential system reliability emergency by 2021 and require “least regrets” actions with respect to OTC deadlines and LSE procurement. (D.19-11-016, Conclusion of Law 1, p. 72.)</i></p> <p>In simplest terms, the shortfalls that have necessitated extending the operations of the OTC Plants remain in place and cannot be mitigated other than by keeping existing capacity available in case it is needed. Having all four OTC Plants available for three years provides valuable insurance against these potential reliability events.</p>	
001.16	The Staff Report identifies four risks to electric reliability. There are additional risks that add to this uncertainty and further justify the need to extend all four OTC Plants through 2023. These	Comment noted. Please see Master Response 2.2, as well as response to comment 001.10.

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	<p>risks include:</p> <ul style="list-style-type: none"> • Energy resources fail to perform as expected • Transmission lines are de-energized to manage wildfire risks in high wind events and imported power is limited • Congestion on transmission lines occurs • New electric resources do not come on-line as scheduled due to development delays • New three-year forward RA obligations adopted by the CPUC in its March 2019 decision (D.19-02-022) that may tighten the market and put additional burdens on LSEs. • Unplanned maintenance on transmission system restricts the ability to import electricity or transmit electricity to load centers • Unplanned outages of generating units reduce supply and threaten system reliability • Wind events and high fire risk that trigger de-energizing transmission lines • Widespread heatwaves across the western US reduce electricity imported into California since the out-of-state resources are needed to serve their local needs 	

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	<ul style="list-style-type: none"> • Reduced hydroelectric capacity imports from Northern US due to drought or increased need from the Pacific Southwest 	
001.17	<p>Of particular concern are the uncertainties associated with the on-line dates for new renewable resources and storage projects which will ultimately replace the capacity from the retiring OTC Plants. If renewable energy resources are delayed due to permitting, supply chain constraints, construction or financing issues associated with COVID-19 or otherwise, then having all the OTC Plants available for three years will provide greater flexibility and greater reliability with negligible environmental impacts. The OTC Plants will be available to operate only when needed. <u>Once a decision is made to retire an OTC Plant, the retirement is permanent and there is no ability to restart the plant if unexpected conditions arise.</u></p>	<p>Comment noted. Please see Master Response 2.2 and response to comment 001.14.</p>
001.18	<p>AES engaged ICF to analyze the local reliability benefits of the Redondo Beach plant under several scenarios. The high-level results are summarized below, and the report can be provided if the Water Board is interested in further detail.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	<p>ICF relied on CAISO’s 2021 Local Capacity Requirements summer peak power flow case and performed independent simulations of the California and LA Basin system in 2021 and 2022. In 2021, ICF observed significant overloads on the LA basin import corridor in the absence of the four OTC extensions with a combined capacity of approximately 3,800 MW (225 MW at Huntington Beach, 1,163 MW at Alamitos, 850 MW at Redondo and 1,500 MW at Ormond Beach).</p>	
001.19	<p>Regarding 2022 and beyond, there are a number of grid reliability risks that existed pre-COVID and are further exacerbated in the COVID environment. A key assumption being made that is assumed to improve reliability in 2022 is that the Mesa 500 kV substation project (“Mesa Loop-in”) will be complete by March 2022. This project has already been delayed in the past. (It was originally targeted for 2020 and then delayed to 2021 and now to 2022.) With COVID-19 related maintenance and construction delays, this project could certainly be delayed further such that it is not available by summer 2022. Additionally, outages and/or loss of other power plants are also possible with two key examples being potential unavailability of the Watson cogeneration facility with its contract expiring in June 2022, and the</p>	<p>Comment noted. Please see Master Response 2.2 and responses to comments 001.10 and 001.14. Additionally, the Mesa Loop-in Project appears on schedule based on reports from Southern California Edison and is expected to come online in March 2022.</p>

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	<p>aging Long Beach combustion turbine plant which CAISO had previously assumed would retire after its 40-year life.</p> <p>To evaluate these risks, ICF then analyzed 2022 by including all OTC Units except the 850 MW from Redondo Beach. For the Base Case ICF also implemented the planned 500 kV Mesa Loop-in transmission upgrade project in this scenario. While under the Base Case, ICF did not see overloads under contingency conditions (e.g. line or generator out for maintenance, and then one additional unexpected contingency), ICF did observe overloads under three plausible scenarios that capture potential uncertainty in the system in 2022. The specific scenarios studied include:</p> <ul style="list-style-type: none"> • Additional delays in the Mesa Loop-in transmission upgrade • Unavailability of the Watson cogeneration plant whose contract expires in June 2022 • Unavailability of both Watson and the aging Long Beach facility. <p>Without Redondo Beach, <u>all three scenarios resulted in overloads in the West LA Basin (i.e. elements at >100% of limits)</u>. These overloads</p>	

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	<p>were relieved by keeping Redondo Beach on-line, i.e. Redondo Beach operation brought the overloaded elements below 100%. While ICF did not specifically study 2023, the results are expected to be similar to the 2022 analysis. This is because of similar supply and demand conditions and uncertainties.</p> <p>Overloads can violate mandatory federal reliability standards under some circumstances. While ICF did not find overloads that violated standards, the existence of mandatory standards emphasizes the seriousness attached to overloads because if not eliminated, equipment can be damaged and/or load must be curtailed. Thus, this analysis indicates that the Redondo Beach plant can be very valuable for maintaining local reliability, especially in light of the many difficult to assess risks facing the West LA Basin.</p>	
001.20	<p>Furthermore, the results may actually understate the reliability stress exacerbated by the loss of the Redondo power plant. First, the analysis assumed that the most stressful hour is the hour ending 6 pm. In fact, in 2022, for the first time, CAISO considers the September hour ending 7 pm the most stressful, and this is part of a trend in which the net peak is occurring later in the day. This is</p>	<p>Comment noted. Please see Master Response 2.2 and responses to comment 001.10 and 001.14.</p>

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	<p>important because the amount of solar generation decreases in these hours, and therefore, other generation is required. Indeed, it is common during Flex Alerts to request conservation until the hour ending 9 pm, and CAISO analyzes 6 hours including the hour ending 9 pm. Second, the level of battery storage injection is uncertain, in part, because the hours of stress are uncertain and may exceed four hours. In the CAISO load flow studied, battery injection was considered zero at one key site, potentially highlighting the concerns that transmission planners have about transmission security and the lack of experience with 4-hour batteries and evening peaks.</p>	
001.21	<p>Finally, there are also a number of additional scenarios not explicitly analyzed by ICF where Redondo Beach would likely provide significant insurance value in being available to address COVID-related supply chain, maintenance and construction shortfalls and delays affecting transmission, generation or storage procurement and transmission upgrades other than the Mesa Loop-in project. ICF is aware that in another major region, MISO, approximately 80% of the planned maintenance outages for generating plants were delayed or cancelled (affecting 30% of total MISO capacity), and 84 transmission</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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	<p>projects were delayed or cancelled.</p> <p>While ICF does not have the latest comprehensive data for CAISO, it is highly likely that delays are occurring in CAISO also. For example, in the CAISO interconnection queue, in the three months since January 2020, there has been a total of fourteen solar, storage and wind projects delayed by over 12 months, impacting 5.6 GW. There are additional delays of shorter periods, ranging from 1-12 months, affecting an additional 5.7 GW (or 20 projects). While these delays have not been explicitly identified as COVID related, they provide some indication of current dynamics. Other risks include potential impacts attributable to the recent importation ban affecting some transmission grid equipment, fire associated loss of transmission, and other threats to grid resiliency such as non-pandemic natural disasters.</p>	
001.22	<p>As confirmed in Section 5.3 of the draft staff report and illustrated in the graphic below, in SACCWIS' Alternatives 2, 3 and 4, with all four OTC plants operating at current capacity, the daily average OTC statewide water use is projected to be at or below flow rates required by the original OTC Policy compliance schedule. This conclusion of</p>	<p>Comment noted. Please see Master Response 2.3. Please also see response to comments 001.02 and 001.07. Although it appears that Alternative 2 in the January 2020 SACCWIS Report would result in daily average flow rates at or below the flow rates required by the original OTC Policy compliance schedule, Alternative 2 was neither supported by the SACCWIS nor the</p>

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	<p>less than significant effects includes the conservative assumption that the remaining seven AES Southland units at the three sites would all continue to operate and use OTC water at the same rate as the twelve AES Southland units did in 2019. AES Southland retired five OTC generating units at the end of 2019, in addition to the two Huntington Beach units retired in 2012.</p> <p>As the graph below demonstrates, which is created with data directly taken from the Staff Report, the impacts to marine life are expected to be at or below the baseline established in the 2010 Final SED if the compliance dates for Alamos, Huntington Beach, Ormond Beach, and Redondo Beach are extended for 3 years (Alternative 2 from the SACCWIS report).</p> <p>The differences between SACCWIS Alternatives 2, 3 and 4 are indiscernible in Figure 1 as the three downward trend lines effectively merge. Figure 1 also shows that under all alternatives, including three-year extensions for all OTC Plants (SACCWIS Alternative 2), that the impacts on marine life are less than significant.</p>	<p>unanimous recommendation of the energy agencies of the SACCWIS. The State Water Board relies on the recommendations of the SACCWIS and affords significant weight to the unanimous recommendations of the energy agencies of the SACCWIS in considering changes to the OTC Policy for grid reliability purposes pursuant to Section 3.B(5) of the OTC Policy.</p>
001.23	AES initiated escrow with New Commune DTLA (“New Commune”) in October 2018 to sell ~50	Comment noted.

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	<p>acres in Redondo Beach which currently is the site of the Redondo Beach OTC Units. AES closed escrow in March 2020, nearly 18 months later, and the 50 acres is now owned by a number of affiliates of New Commune, collectively referred to as SLH Fund, LLC (“SLH Fund”). AES has a lease with the new owner to allow for continued operations of the Redondo Beach OTC Units through 2023, if the Water Board approves an extension.</p>	
001.24	<p>In early 2020, when it was clear from heightened RA market activity, that all of the OTC units would likely be needed to continue to meet system reliability needs through 2023, AES worked with SLH Fund to design a land use covenant (“Covenant”) to balance the need for steady progress for land re-use and restoration, and continued operations. This Covenant was created and executed prior to the close of escrow and filed as part of the property transfer. (See Exhibit B: Land Use Covenant)</p> <p>The Land Use Covenant:</p> <ul style="list-style-type: none"> • Recognizes possible continued operations at the Redondo Beach Site through 2023 • Sets aside a portion of the Redondo Beach 	Comment noted.

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	<p>operational revenue from 2021 – 2023 (up to \$14M in a restricted escrow account) to fund land use planning, site assessment, clean-up, and permitting/engineering for transmission line removal</p> <ul style="list-style-type: none"> • Delineates that up to 25 acres or 50% of the land shall be public open space and related public amenities if the Redondo Beach OTC Units are approved to operate through 2023 • Provides \$14 million dollars of funds for early investments in land remediation and restricts the use of those funds to clean-up and open space planning only • Gives the City of Redondo the option to buy up to 15 acres of the 25 acres for parks and open space for a nominal option acceptance fee (\$100) • Sets the City of Redondo Beach land purchase option price at \$2 million an acre for fully remediated land, a discount to the expected market value • Gives the City of Redondo Beach up to 3 years to raise funds to buy up to 15 acres • Regardless of future energy needs, agrees to retire Redondo Beach units at the end of 2023, including providing the City of Redondo Beach a legally enforceable 	

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	<p>property right to enforce the land use covenant and retirement of the Redondo Beach OTC plant in 2023</p> <ul style="list-style-type: none"> Identifies the ~5 acres of wetlands as property the City of Redondo Beach can purchase 	
001.25	<p>AES recognizes that it is rare to have 50 acres of coastal property come available in Southern California. The future use of this property impacts the entire region and has the attention of a broad set of stakeholders. Additionally, AES knows the community would like to see the property transitioned from industrial use to other beneficial uses including public open space and other repurposing that benefits the local community.</p> <p>The framework AES, SLH Fund and Tree People are currently developing will achieve important open space and environmental goals and provide funding to support early action on the plans for redevelopment if Redondo Beach were granted a 3-year extension. In fact, with the additional funds, engineering, site clean-up and permitting can be accelerated for the more sensitive environmental aspects of the 50 acres.</p>	Comment noted. Please see Master Response 2.1.

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001.26	Some stakeholders have asserted that an extension of the OTC unit operations will delay the property redevelopment and park space. This is simply not true. The property has been sold, as was planned in 2018. An extension of the operations under the lease with SLH Fund will actually secure early redevelopment funds and support accelerated site clean-up and creation of public open space.	Please see Master Response 2.1.
001.27	<p>In March 2020, AES and SLH Fund began collaborating with Tree People to develop concepts for parkland, public open space, wetlands restoration, coastal access and other related public amenities for the surrounding communities. Today, AES, along with SLH Fund are working with TreePeople to make progress toward an early transition of the 50 acres from industrial to enjoyable and usable public open space.</p> <p>Site transition and restoration will require considerable investments in planning, designing, engineering and construction. Having a proven land stewardship partner with the internal capabilities and vision to lead this coastal property transition will provide immediate progress and contribute to the long-term success. TreePeople</p>	Comment noted. Please see Master Response 2.1.

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	<p>has the experience, skills and financial acumen to take on such a project. Today, Tree People has about 3,000 acres of property acquired in Los Angeles County which is dedicated for open space and public use.</p> <p>AES recognizes that transitioning 50 acres on California’s beautiful coast is a once-in-a-lifetime opportunity and is pleased to support the new owners and third-party partners, like TreePeople, to achieve a responsible and immediate transition for this coastal property that is meaningful for all of the surrounding communities.</p> <p>We also recognize that conventional land use permitting, and entitlements follow a chronology which usually delays sensitive area restorations until final land use plans and entitlements are approved, often taking 5 to 10 years. The value of this early funding and partnership with a proven non-profit land steward means not waiting to make progress to develop the open space.</p>	
001.28	While AES had hoped to also bring in the City of Redondo Beach as a coalition partner, the City lacked the funds and the ability to raise the money to purchase the property in 2020 and could not build consensus or support from their governance	Comment noted. Please see Master Response 2.1.

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	<p>body to partner with AES and SLH Fund. Additionally, it became clear that the internal capabilities for land stewards that Tree People offers would be extremely valuable to begin the immediate work to redevelop and restore the 50 acres.</p>	
001.29	<p>Some participants at the public workshop held April 21, 2020 suggested that “low capacity factor” OTC units are not needed. This is incorrect. There is an important distinction between the role of capacity and energy generation in providing for reliability. Having low capacity OTC units available for three years may be the difference between meeting energy reliability needs and rolling brownouts or blackouts.</p> <p>The table below shows the capacity factors of the AES OTC Plants over the last three years. On average, they operated at less than 5% of their potential annual output or capacity factor and last year ran at about 3% capacity factor.</p> <p>Annual capacity factor is a measure of how much electricity was produced by a power plant over the year, compared to how much electricity could have been produced if all the generating units at the power plant operated at their maximum output</p>	Comment noted. Please see Master Response 2.2.

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	<p>for every hour of the year. A low capacity factor should not be interpreted to mean a generating unit is not needed. Similarly, if there are several units with low capacity factors, one cannot assume that one or more of the units can be retired and the other units can simply operate more. The system may still need the capacity and energy from all the plants simultaneously during peak demand events, periods of low renewable power generation, or other contingencies.</p> <p>A low capacity factor unit may operate only a few days or weeks a year and not always at 100% of its rated output. However, during those few days or hours, the low capacity factor unit is providing the last increment of power needed to ensure electric system reliability. The last increment of electricity is like the last inch of lift for a high jumper to clear the bar. Without the last bit of energy from low capacity factor units, California will not clear the electric reliability bar and rolling brownouts or blackouts may occur.</p> <p>Electricity consumption or demand in California is generally driven by weather. Higher temperatures and prolonged heat waves increase the electricity demand. During these periods of high demand, it is typical that all available resources, including all</p>	

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	<p>OTC Plants are operating to ensure there is enough capacity in service to meet the peak demand and supply the very last kilowatt of need. Another OTC unit cannot simply replace the output from an OTC unit that retired prematurely because the other OTC unit will already be in service during these conditions.</p> <p>To further illustrate, the CAISO’s system load-duration curve below shows the percentage of time during 2017 that the total demand for electricity in the CAISO system was above certain levels. The data is taken directly from the CAISO’s OASIS system.</p> <p>During only 5% of the year the approximate demand was between 37,500 MW and 50,000 MW. During these peak periods up to another 12,500 MW of resources needed to operate to meet demand. A portion of this incremental need is usually met by the OTC units at issue in this proceeding. The four OTC Plants under consideration for extension, if they are available, provide a total 3,733 MW of capacity. This generation may not be needed the other 95% of the time, but if it is not available during the 5% of the time when consumption is abnormally high, the electricity demand will not be satisfied, and</p>	

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	<p>there is a risk that outages will occur.</p> <p>The peak demand, the last 12,500 MWs of capacity is only needed at the extreme peak periods. As shown in this curve, those additional 12,500 MWs would likely have a very, very low “capacity factor,” since they hardly run except during times when the electric system is stressed. While they are rarely needed, they are important capacity resources, as they are literally the last increment that ensures the lights stay on in Southern California.</p> <p>The OTC units essentially serve as a very important insurance policy to keep the electricity flowing in high demand scenarios or when there are unplanned outages of the transmission system or generating units.</p>	
001.30	<p>At the April 21, 2020 Water Board public workshop to discuss the content of the Draft OTC Policy Amendment and Staff Report, air emissions and the compliance status of Redondo Beach were raised. Specifically, Vice Chair D’Adamo requested additional information regarding the air emissions for the Redondo Beach units. Stakeholders from the community presented air emission information that was extremely</p>	<p>Comment noted. Please see Master Response 2.5.</p>

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	<p>inaccurate during this workshop. Due to the amount of misinformation presented and the possibility that this information could potentially mislead the Water Board, AES Southland requested a third-party review of the Redondo Beach plant's compliance with federal, state and local air quality regulations, rules, permit conditions and related requirements. This third-party review provided by Yorke Engineering LLC is attached as Exhibit C.</p>	
001.31	<p>The air emissions from the Redondo Beach facility are subject to, and in compliance with, all federal, state and local laws, ordinances, regulations and standards established for the protection of air quality. The South Coast Air Quality Management District (SCAQMD) is the US EPA's and California Air Resources Board's delegated authority for the permitting and compliance of air emissions in the south coast air basin, which includes the Redondo Beach power plant.</p> <p>The mission of the SCAQMD is to clean the air and protect the health of all residents in the South Coast Air District. The SCAQMD is responsible for permitting and controlling emissions from stationary sources of air pollution which includes large industrial facilities like power plants to small</p>	Comment noted. Please see Master Response 2.5.

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	<p>facilities and retailers like corner gas stations. One of the primary ways the SCAQMD controls air emissions to protect the health of all residents in the south coast air basin is through the issuance of permits to stationary sources such as the Redondo Beach plant, by requiring all major sources to continuously monitor and report their emissions, and by enforcing the conditions of issued permits through annual audits and regular inspections of facilities.</p> <p>The Redondo Beach facility is in compliance with all air quality rules, regulations and permit conditions of the SCAQMD. The current SCAQMD Title V and operating permit was issued on February 5, 2019, was last modified January 1, 2020 to remove the now permanently retired OTC generating Unit #7, and is valid through February 4, 2024, fully supporting the operation of the facility through an OTC extension of December 31, 2023. Per both federal and state law, the SCAQMD cannot grant a new, amended or renewal of an air permit unless the facility can demonstrate current compliance with all existing permit conditions and rules. Redondo Beach made this demonstration, as confirmed by the SCAQMD's permitting approvals.</p>	

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001.32	<p>In addition to the compliance record of Redondo Beach, comments during the April 21 Water Board workshop implied that the power plant causes a significant impact to air quality. Data from the California Air Resources Board and the SCAQMD do not support such a conclusion. The 2016 State Implementation Plan emissions data for the SCAQMD for 2019 shows that ALL electrical utilities and power plants operating in the district accounted for only 1.08% of PM2.5 emissions, 0.15% of Reactive Organic Compounds (ROG), and 1.38% of oxide of nitrogen emissions (NOX), while mobile sources accounted for 19.57% of PM2.5, 30.35% of ROG and 82.3% of NOX. This data clearly shows the limited role power plant emissions have in impacting local air quality relative to mobile sources.</p>	<p>Comment noted. Please see Master Response 2.5. Additionally, to calculate accurate emissions data for each year, the California Emissions Projection Analysis Model: 2016 State Implementation Plan - Standard Emission Tool created by the CARB can help break down emissions by sector, district, and type of compound.⁵</p>
001.33	<p>Participants at the April 21 public workshop were shown two photographs of isolated emission events at the Redondo Beach facility. In presenting the photographs, the Redondo Beach representatives correctly noted that the photographs were of “upset events.” The photos</p>	<p>Please see Master Response 2.5.</p>

⁵ California Air Resources Board. California Emissions Projection Analysis Model. <https://www.arb.ca.gov/app/emsinv/fcemssumcat/fcemssumcat2016.php>.

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	were taken of rare situations where there was an equipment failure. An “upset event” is colloquially, a temporary breakdown of some portion of the equipment.	
001.34	Though noting the photographs were of upset events, the presenter nevertheless suggested that visible emissions or smoke from the plant was a common occurrence which posed risks to the residents of Redondo Beach. This is simply incorrect.	Please see Master Responses 2.1 and 2.5.
001.35	Despite best efforts, including pro-active maintenance programs and regular inspections, equipment breakdowns and process upsets can occur. The Redondo Beach plant has a history of immediately reporting equipment breakdowns and quickly correcting any such issues. Acting upon that self-reporting and its own investigations, the SCAQMD evaluates upset events and whether the event was avoidable. The SCAQMD may in its discretion issue a Notice of Violation (NOV) for such events or other non-compliances of any rules, regulations, or permit conditions.	Comment noted. Please see Master Response 2.5.
001.36	The Redondo Beach facility has not received any NOVs for any such upset events. It has also not received any NOVs for any reason since May	Comment noted. Please see Master Response 2.5.

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	<p>2017. Redondo Beach self-reported these infrequent equipment breakdowns. Significantly, after reporting and investigation, no upset event was cited or demonstrated to result in danger to human health and the environment. While providing fodder for sensationalism, historic breakdown events are not representative of the operations of the Redondo Beach facility which is in compliance with all applicable laws and regulations.</p>	
001.37	<p>Several commenters at the April 21, 2020 workshop referenced the existence of wetlands on the Redondo Beach power plant site and the alleged need to pump water from these wetlands. One commenter asserted that the Redondo Beach plant was unable to operate because it lacked the required permit. This is not accurate. Redondo Beach can operate through 2023 safely and reliably and without impact to any on-site wetlands.</p>	<p>Comment noted. Please see Master Response 2.4.</p>
001.38	<p>Redondo Beach does not need any additional permits other than the regular renewal of its NPDES permit. Moreover, Redondo Beach is not pumping water from any wetlands and does not have any need to do so in the future. Therefore, a Coastal Development Permit (“CDP”), as</p>	<p>Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report for an updated description of land use impacts, including compliance with all associated state and local permits, laws, and regulations.</p>

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	referenced by commenters at the workshop, is not required.	<p>Because of the site’s designation, any person wishing to perform or undertake development in the Coastal Zone must first obtain a CDP, and any development activity conducted in the Coastal Zone without a valid CDP constitutes a violation of the Coastal Act and the LCP. The May 26, 2020 NOV from the Coastal Commission states that the unpermitted installation and use of water pumps to pump groundwater constitutes a Coastal Act/LCP violation. In the NOV, the Coastal Commission states that it does not consider the installation, use, or maintenance of AES’ water pumps to be exempt due to their proximity to a wetland, which is considered to be an environmental sensitive habitat area. Thus, the installation and operation of the subject water pumps is considered to be unpermitted development by the Coastal Commission, which states that further maintenance and operation of these pumps will be considered knowing and intentional violations of the Coastal Act and the City of Redondo Beach’s certified LCP.</p> <p>Based on the NOV issued by the Coastal Commission to AES and SLH Fund on May 26, 2020, the portable pump system that was installed requires a CDP.⁶</p>

⁶ California Coastal Commission (Coastal Commission). May 26, 2020. Notice of Violation.

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001.39	<p>As background, when Redondo Beach pursued a license from the CEC to replace the Redondo Beach plant with a new combined cycle plant, the California Coastal Commission (CCC) provided comments to the CEC indicating the presence of 5.93 acres of wetlands on the property. According to the CCC, the wetlands are located in the containment basins that held the former fuel oil tanks. The tanks were removed in 2006, but the containment areas remain. The tank basins are in an area of the Redondo Beach power plant that is no longer in service.</p>	Comment noted.
001.40	<p>In the late 1960's, these containment areas began collecting water and the previous owner, SCE, installed a pump system to dewater the tank basins to remove the water. The installation of the system pre-dated the Coastal Act. The ponding of water in the tank basins coincided with the installation of the West Coast Basin Barrier Project ("Barrier Project") that began in the 1950's and was finally finished in 1968. The Barrier Project was constructed to prevent salt-water from infiltrating the ground water, but it also caused a rise in ground water level. The tank basins were dry prior to the installation of the Barrier Project.</p> <p>SCE operated the dewatering system until AES</p>	Comment noted. Please see Master Response 2.4.

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	<p>purchased the plant in 1998 and then AES continued to dewater the tank basins. In late 2014 and early 2015, routine maintenance was done on the dewatering system to address clogging in the system and repairs were made to the pumps. The system was returned to service after the repairs were completed. In August 2015, in coordination with the City of Redondo Beach, the CCC directed Redondo Beach to stop the tank basin dewatering and Redondo Beach complied through 2017. During this period, significant ground water seepage returned to and flooded several of the tank basins. Groundwater began to intrude into some electrical and utility vaults serving the power plant. In 2017, an Emergency CDP (“ECDP”) to resume partial operation of the dewatering system in order to lower the level of ponding in the tank basins was issued. The ECDP is now expired.</p>	
001.41	<p>In April 2019, Redondo Beach applied for a regular CDP for the dewatering system, but this application has since been withdrawn. Instead, Redondo Beach has mitigated its original concern over the water intrusion into vaults by installing small portable pumps in the impacted vaults that remove the water from the vaults when necessary. This has eliminated any need to</p>	<p>Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report for an updated description of land use impacts, including compliance with all associated state and local permits, laws, and regulations. Please also see response to comment 001.38.</p>

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	<p>operate the tank basin dewatering system and the CDP has been withdrawn. There are no on-going safety or operational risks and the power plant can be safely and reliably operated through 2023.</p>	
001.42	<p>The work of the CPUC on Environmental Justice and social justice issues has been exemplary. In February 2019, the CPUC “after months of development and public consultation” adopted its “Environmental and Social Justice Action Plan.”</p> <p>One of the primary objectives of the Environmental and Social Justice Action Plan is that “...the CPUC lays out its vision for integrating environmental and social justice into its work by proposing objectives and actions to achieve its nine overarching Action Plan goals.” The first goal of the Environmental and Social Justice Action Plan is to “Consistently integrate equity and access considerations throughout CPUC regulatory activities.</p> <p>The CPUC’s Environmental and Social Justice Action Plan defines “disadvantaged communities” to include communities located in the most environmentally burdened California Census Tracts. Disadvantaged communities are determined using Cal EPA’s CalEnvroScreen tool</p>	<p>Comment noted. Please see Master Response 2.5. Please also see Sections 5.5 and 5.6 of the Staff Report for a description of environmental justice concerns.</p>

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	<p>as being communities in the 75th percentile of “Pollution Burden” (i.e., the top 25% of the most pollution burdened communities).</p> <p>None of the three AES Southland sites are in disadvantaged communities. Redondo Beach, Huntington Beach, and Long Beach all fall below the 75th percentile for Pollution Burden on a Census Tract basis using Cal EPA’s CalEnvroScreen.</p> <p>Huntington Beach is in the 1-5 percent range. Redondo Beach is in the 45-50 percent range. For the multiple Census tracks bordering the Alamitos site in Long Beach, none are in the 75th percentile. The fourth OTC site, Ormond Beach, is in the 80-85 percent range and therefore is a disadvantaged community.</p>	
001.43	Local opposition is not equivalent to the broader social obligations to disadvantaged communities.	Comment noted. Please see Master Response 2.1.
001.44	The Staff Report states, “Of the four power plants, Redondo Beach is the least efficient, requiring more OTC intake water to produce a megawatt-hour than the other power plants, and resulting in potential impacts to marine life (Figure 11 in the 2010 Final SED).” (SWRCB Staff Report, p. 14.)	Comment noted. Please see Master Response 2.3 and Section 5.3 of the Staff Report for a description of impacts to marine life. Additionally, please see response to comment 001.47 for a discussion of efficiency in the context of the OTC Policy.

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	This statement is misleading.	
001.45	<p>First, the Staff Report also correctly finds that the operation of all four OTC Plants, collectively, for an additional three years each would not result in any significant impacts on marine life:</p> <p><i>Based on the discussion above, impacts to marine life are expected to be at or below the baseline established in the 2010 Final SED if the compliance dates for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are extended for up to 3 years. (SWRCB Staff Report, p. 14.)</i></p>	<p>Impacts associated with use of OTC were described in the 2010 Final SED. As noted in Section 5.3 of the Staff Report and Master Response 2.3, impacts to marine life are expected to be at or below the baseline established in the 2010 Final SED if the compliance dates for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are extended.⁷</p>
001.46	<p>Second, using the data reported and relied upon in the 2010 Final Substitute Environmental Document (“SED”), actual OTC water usage data, Redondo Beach is by this SED standard, the most “efficient” in the May-October reporting and the second most efficient OTC unit in the June-September reporting period if efficiency is defined by total actual water usage:</p>	<p>Comment noted. Please see response 001.47.</p>

⁷ State Water Resources Control Board (State Water Board). May 4, 2010. Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling Final Substitute Environmental Document. https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/otc_sed2010.pdf

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	<p>2010 FINAL SED TABLE 6</p> <p>The SED Table 6 data, another proxy for powerplant OTC water use “efficiency,” demonstrates the potential fallibility of trying to define OTC efficiency using a single metric.</p>	
001.47	<p>Third, using the single metric of MG/MWHR is not an accurate measure of efficiency. The Staff cites to Figure 11 in the 2010 Final SED, which uses the single measuring criteria for “efficiency” --the average volume of cooling water in millions of gallons per MWh generated, or MG/MWHR. The megawatt hours is literally the number of megawatts generated in one hour. That hourly number changes depending upon whether a generating unit operates at 100% of total output, minimum output or somewhere in between. For example, a 100 MW unit operating at 100% load generates 100 MWHrs. That same powerplant operated at 50% of total output generates 50 MWHrs.</p> <p>Under both scenarios, the OTC flow would be exactly the same. Unlike variable speed swimming pool pumps, OTC pumps are fixed rate. OTC pumps are either on or off. Water use is fixed. Accordingly, a unit operating at 100%</p>	<p>The term efficiency was not generally used as a measure of gross water intake or energy output. While the ratio used in the 2010 Final SED may not reflect how the generators are used in electricity production, it does reflect efficiency by showing the long-term average ratio of OTC flow to energy generated for the OTC facilities in California. This metric compares production of electricity with usage of OTC water among OTC facilities, and in doing so reflects facility efficiency.</p> <p>Furthermore, while Redondo Beach may not have a comparatively high median monthly flow rate, this metric is not intended to reflect efficiency, but rather reflects the actual cooling water flows.</p>

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	generating 100 MWhr uses the same number of gallons of water if it is operated at 50% of its output.	
001.48	In addition, one of the primary roles the OTC units serve is to be available to ramp up output as the sun sets and solar generation decreases and eventually goes to zero. To serve in this capacity, the OTC units frequently operate at minimum output during the day when the solar resources are at their peak, but then ramp up to full output as the sun sets, filling in for the declining solar production. The extended operation at minimum output with a fixed volume of OTC flow will make it appear that the unit is not very “efficient” when, in reality, it is being dispatched in the optimal manner to ensure reliability and minimize electricity costs. Having OTC Units available to gradually ramp up fills the ramp down of solar and other intermittent resources. Two of the three Redondo Beach units can operate at 10 MW minimum output, which is the lowest minimum output of all the OTC Units. The units are highly flexible and serve the system well, but certain metrics may make it appear they are less “efficient” from a water use standpoint when it really is only a function of how the units are being	Comment noted. Please see Master Response 2.2 and response to comment 001.47.

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	used to ensure electric reliability.	
001.49	<p>AES Southland respectfully requests the Water Board to authorize extensions of all four OTC Plants through 2023. We ask the Water Board to consider: 1) new important market data shared in this filing which clearly indicates a strong need for all OTC plants to be available through 2023 to serve system reliability needs; 2) the potential economic impacts and resulting increased electric prices and effect on customers with a supply-limited market; 3) the potential risks to electric system reliability if all four OTC plants are not available as an insurance policy during 2021-2023; 4) the data AES shared demonstrating full compliance with air, water and coastal permits; and 5) the unique beneficial plans underway for the AES / SLH Fund Redondo Beach coastal property.</p> <p>Balancing all of the human and environmental concerns discussed above in these uncertain times, a three-year extension for all four OTC Plants is prudent based on the facts, and we urge you to approve Alternative 2 from the January 2020 SACCWIS report, , allowing all four OTC Plants to continue to be available to support</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, 2.5, and 2.6. Please also see responses to comments 001.02, 001.07, 001.08, and 001.10.</p>

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	system reliability through 2023.	
002.01	As a preliminary matter, we note that the Draft Staff Report does not analyze Alternative 2 set forth in the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) January 23, 2020 Final Report concerning three year extensions for all four OTC units through 2023 to protect human health and the environment while ensuring grid reliability and resource adequacy. For reasons discussed in our comments at the Board's April 21, 2020 OTC Policy Amendment Workshop and set forth below, SLH urges the Board to consider Alternative 2 and to extend the operating date for Redondo Beach generation station to 2023.	Comment noted. Please see Master Responses 2.1 and 2.2, as well as responses to comments 001.02, 001.07 and 001.10.
002.02	Prior to the onset of COVID, SLH hoped to transform this site to a beautiful new development with public open space, coastal access, offices, studio and production spaces, hotel rooms, and retail shops. Given the long-lasting concerns of COVID, SLH will have to wait and see how our society adapts in the coming months and years to better understand the impacts on the function and use of various types of real estate prior to finalizing a program.	Comment noted. Please see Master Responses 2.1.

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002.03	<p>While the City of Redondo Beach has been working for many years to shut this plant down and reimagine the site, now is not the time. The 2010 OTC policy has led to the decommissioning of numerous power plants along the coast and has contributed greatly to improved water quality. Given the limited use of AES Redondo Beach generation station (3-4% of capacity), the impacts of its operations on coastal marine life over the coming years are anticipated to be nominal.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.3 for a discussion of impacts to marine life associated with the Amendment.</p>
002.04	<p>It is anticipated that the post-COVID world will see significant portions of the workforce working remotely while office buildings remain open, albeit with less people. As an office building owner, SLH can assure the Board that the energy use of its buildings will be for the most part unchanged despite reduced capacity from social distancing and with more people working from home, overall energy usage will increase after stay at home orders are lifted and workforces are split between their homes and offices in this new normal we will be living with for some time to come.</p> <p>At the April 21, 2020 OTC workshop, we were surprised to hear Redondo Beach Councilman Horvath state that continued operation of the AES plant is “not needed to ensure grid reliability.”</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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	<p>Horvath is the City’s representative to the Los Angeles County Clean Power Alliance (CPA), a community choice aggregator. This statement is clearly contradicted by a California Public Utility Commission directive to the CPA and other community choice aggregators to procure additional power to ensure resource adequacy. The CPA provides electricity to many Redondo Beach residents and businesses and in prior years has contracted with OTC power generating plants including AES Redondo Beach as a low-cost market resource for the region.</p>	
002.05	<p>SLH and AES met on numerous occasions with City officials including the councilmembers and the Mayor to discuss ways to help the City achieve its goals of creating a park at the Redondo Beach generation plant site. SLH offered to set aside open space, but the City insisted on ownership. We are deeply disappointed that Mayor Brand now calls the land covenant “an absurd offer” and continues to incorrectly insist that “parks and open space are already the only permitted use on the site.” If Mayor Brand is correct, then the City has violated the Constitutional rights of SLH and put the City at risk for yet another costly and protracted lawsuit.</p>	<p>Comment noted. Please see Section 5.5 of the Staff Report for an analysis of land use impacts and Master Response 2.1.</p>

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	<p>Without a sensible partner in the City to negotiate with, SLH and AES agreed on a public benefits package and has been working with the highly regarded non-profit environmental organization Tree People about the design, development, and management of the open space component of the package. The public benefits package recorded as a land covenant at the time of sale of the property does the following:</p> <ul style="list-style-type: none"> i) Sets aside a portion of the revenue from 2020 – 2023 for new community benefits. ii) Dedicates up to 25 acres (over 50% of the site) to public open space. iii) Provides \$14 million dollars for land remediation, a process already underway between SLH and the State of California iv) Gives the City of Redondo Beach the option to buy up 15 acres of the 25 for parks and open space for a nominal option fee (\$100) and at a price of \$2 million per acre or close to half the actual cost of the land post cleanup. v) Gives the City of Redondo Beach legal authority to retire the OTC plant in 2023. <p>SLH is also working with AES and TreePeople to finalize an MOU for the management,</p>	

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	development and operations.	
002.06	<p>SLH also wishes to address and rebut misinformation provided by the City of Redondo Beach. In November 2019, the CPUC recommended only a two-year extension of AES Redondo Beach for resource adequacy. This recommendation noted specifically that a) they were persuaded by testimony from the City before SACCWIS and that it would interfere with plans to redevelop the sites; and, b) that the City was seeking to purchase a portion of the site for parkland.</p> <p>First, without the public benefits package agreed to between SLH and AES, the City has no prospect of owning any portion of the Redondo Beach generation station site.</p> <p>Second, without AES' continued operations and the funding it would generate pursuant to a public benefits agreement reached between SLH and AES, there is little prospect of any clean up or remediation work commencing until the site is entitled for redevelopment project. Given the numerous unsuccessful attempts over the last two plus decades to redevelop this property, even SLH has little hope of seeing that work begin until</p>	Comment noted. Please see Master Response 2.1.

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	<p>at least a decade from now.</p> <p>However, if AES continues to operate until 2023 they will provide site access and establish a remediation fund that SLH can draw on to fund cleanup efforts while it is still operational with the goal of being able to clean up nearly half the site during a three year extension period. SLH is currently in discussions with the Department of Toxic Substance Control (DTSC) to finalize a remediation plan.</p>	
002.07	<p>Third, Redondo Beach officials have made misleading and inaccurate statements about the status of prior negotiations with SLH. These statements have included:</p> <ul style="list-style-type: none"> i) In February 2019, SLH agreed to aid the City’s application for a \$30M grant from the California Natural Resources Agency by signing a letter confirming openness to selling the City up to 25 acres- over half of the AES property- for parkland and open space at a price of \$2 million per acre, which is far below the cost of cleaning up the land. At that time, the City informed SLH that it had no intention of buying all 25 acres. SLH’s conversations with the City 	<p>Comment noted. Please see Master Response 2.1 and Section 5.5 of the Staff Report for a description of land use impacts. Negotiations between the City of Redondo Beach and associated parties are generally outside of the scope of the Amendment. While the State Water Board may consider factors not directly before it, the Amendment is an inappropriate venue to address land use issues and disagreements.</p>

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	<p>were predicated upon SLH purchasing other leasehold interests from the City which it no longer desires and are mired in years of litigation with another developer.</p> <p>ii) Testimony by one Redondo Beach official at the April 21 OTC Workshop that the city has made “significant progress in obtaining financing” to purchase the AES site, and that “more” state money is coming “soon” when in fact the City does not currently have the funds to purchase more than 2 acres of the site, nor do they have any prospect of securing the required funds in the near future. Ultimately, The City received only \$4.8 million from the State, enough to purchase about 2 acres. There are no additional state funds forthcoming. Governor Newsom has announced he will reduce funds for parkland purchases in the state budget. The land covenants recorded by SLH extend the City’s option to purchase the 15 acres for three years at the previously negotiated below market price. Without the extension of the operations deadline, the City has no right to purchase any portion of the site.</p> <p>iii) Contrary to City’s testimony at the OTC Workshop, the City’s Enhanced</p>	

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	<p>Infrastructure Financing District (EIFD) is not operational, has not conducted any public meetings to advance its formation, has no tax increment and no prospects of such increment in the near term without a redevelopment of the power plant. The EIFD requires SLH's approval of any proposed financing as SLH controls in excess of 55% of property in the proposed district, and would be significantly disadvantaged if created prior to the 2020 tax roll in December.</p> <p>iv) Representatives of the City of Redondo Beach also stated that they are in negotiations with Southern California Edison (SCE) to acquire land under unsightly power lines near the King Harbor to construct a greenbelt. However, SCE has confirmed that it only anticipates removing the 220kV lines in conjunction with or after construction of an SLH funded turn-around station, which is at SLH's sole discretion and currently estimated to cost more than \$10 million. Without relocating the turnaround, SCE has neither the funds nor the ability to relocate or release any land within the right of way corridor. Without funds generated from an</p>	

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	<p>extension, approximately 22 acres of SCE right of way will remain a visual blight for decades to come as no work will be commenced in the near term, if at all.</p> <p>Without the requested extension, the AES Redondo Beach generation station site will sit vacant without improvements until entitlements are secured from the City, which given its record on redevelopment projects, could take another generation.</p>	
002.08	<p>We also urge the Board to carefully consider the implications of each scenario under discussion for disadvantaged communities. We commend the Board for launching a policy initiative to incorporate environment justice (“EJ”) considerations “into the development, adoption, implementation and enforcement of Board decisions, regulations and policies”, and to coordinate with the Office of Environmental Health Hazard Assessment (OEHHA) on “research and data collection in communities of color and low-income populations”. The Board has defined environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of all</p>	<p>Comment noted. Please see the discussion on environmental justice concerns in Master Responses 2.1, 2.2 and 2.5. Please also see responses to comments 001.02 and 001.07. Additionally, Sections 5.5 and 5.6 of the Staff Report were revised to discuss environmental justice concerns and acknowledge that disadvantaged communities often disproportionately experience environmental impacts.</p> <p>To the extent practicable, the State Water Board will consider environmental justice issues. However, the State Water Board’s main responsibility and jurisdiction is to implement CWA section 316(b).</p> <p>As noted in Sections 5.1 and 5.4 of the Staff Report, the City Manager of Oxnard and GenOn mutually negotiated an agreement that, if the Ormond Beach’s compliance</p>

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	<p>environmental laws, regulations, and policies.”</p> <p>We respectfully note that the Draft Staff Report does not contain an analysis of the environmental justice considerations of the proposed amendment of OTC policy. While we are aware the Board has not yet adopted a formal EJ policy, we view the omission of any EJ discussion as a serious deficiency in the Draft Staff Report given its recommendation to extend OTC generation plant operations in a disadvantaged community for 3 years while recommending a one year extension of operations for an OTC generation plant in a wealthy community with a low CalEnviro Screen Score.</p> <p>The Draft Staff Report recommends a 3-year extension of the closure deadline for OTC generation stations at Ormond Beach, Alamitos, and Huntington Beach and a one-year extension for the Redondo Beach generation station. According to the current OEHHA CalEnviro Screen, the Oxnard neighborhoods surrounding the Ormond Beach station have a score of 80-</p>	<p>date is extended, would provide a site closure plan for Ormond Beach. The Oxnard City Council unanimously approved Agreement No. A-8207⁸, which establishes a timeline and financial plan for the demolition and remediation of Ormond Beach, funded by GenOn up to \$25 million, if the compliance date is extended through 2023. Section 5.1 of the Staff Report notes that a 3-year extension of Ormond Beach’s compliance date would be beneficial to the surrounding community since the agreement between the City of Oxnard and GenOn provides a demolition and remediation timeline. It should be noted that Agreement No. A-8207 was approved with minimal controversy.</p>

⁸ City of Oxnard. Agreement for Demolition and Remediation of the Ormond Beach Generating Station. <https://oxnardca.civicclerk.com/Web/GenFile.aspx?ad=3233>.

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	<p>85%, a median income of \$68,000, and a population that is 76% Latino or Black with 14% living in poverty. It clearly meets the definition of a disadvantaged community under CalEnviro Screen rankings and pursuant to SB535. In contrast, Redondo Beach has an CalEnviro Screen score of between 40-50%, a median income of \$112,000 and a population that is 80% white with just 5% living in poverty. Neighboring Hermosa Beach, is also 80% white with a median household income of \$137,000 and has a CalEnviro Screen score of 1-10% - which is extremely low.</p> <p>Thus, the recommended approach in the Draft Staff Report would extend OTC operations for three years in a legally disadvantaged community while limiting OTC operations in a wealthy, white community. We urge the Board to carefully consider these impacts before making your decision.</p> <p>For all the reasons stated above, SLH strongly urges the Board to consider adoption of alternative 2 in the Staff Report and to extend the operation date of the AES plant to 2023.</p>	
003.01	I am writing on behalf of the over 300 members of	Comment noted. Please see Master Responses 2.1 and

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	<p>the Beach Cities Democrats to oppose the recent recommendations made by the Public Utility Commission and the State Advisory Committee on Cooling Water Intake Structures to extend the Once Through Cooling Policy’s compliance deadline for the AES Redondo Beach power generating facility.</p> <p>Our members that live in Redondo Beach, and the surrounding beach cities, are tremendously impacted by the air pollution and radiating power transmissions lines produced by the AES plant. There are 21,0000 people living within 1 mile of the AES power plant. The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p>	<p>2.5.</p> <p>Additionally, concerns regarding health impacts from radiating power associated with transmission lines are beyond the scope of the Amendment. For additional information, please see information from the U.S. EPA at https://www.epa.gov/radtown/electric-and-magnetic-fields-power-lines, which notes that scientific studies have not clearly shown whether exposure to electromagnetic fields increases cancer risk.</p>
003.02	<p>The AES plant site includes six acres of historical wetlands, known as the Old Redondo Salt Lake. The current method of cooling the power plant kills millions of marine life and discharges warm water back to the ocean, contributing to the deterioration of the ecosystem. Keeping the AES plant in operation contradicts with the California Coastal Commission requirements to preserve</p>	<p>Comment noted. Please see Master Responses 2.1, 2.3, and 2.4. Additionally, the OTC Policy does not prevent the Coastal Commission from administering the California Coastal Act of 1976. As a member of the SACCWIS, the Coastal Commission plays a role in reviewing plans and schedules provided by dischargers and advising the State Water Board on the OTC Policy’s implementation. However, the SACCWIS’ Memorandum</p>

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	those wetlands.	of Agreement, which sets forth principles, procedures and agreements to which the signatory agencies of the SACCWIS commit themselves, does not limit the rights or authority of any agency or entity, including the Coastal Commission, participating in the SACCWIS. ⁹ Therefore, the Coastal Commission continues to carry out its mission pursuant to the Coastal Act.
003.03	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p> <p>Currently, the facility is scheduled to close at the end of 2020. Retiring the AES plant and restoring coastal wetlands will improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Comment noted. Please see Master Responses 2.1, 2.2, 2.3 and 2.4.
003.04	Extending the Once Through Cooling compliance	Please see Master Responses 2.1, 2.2, and 2.5.

⁹ SACCWIS. Memorandum of Agreement Among the State Water Resources Control Board, California Air Resources Board, California Coastal Commission, California Energy Commission, California Public Utilities Commission (CPUC), California State Lands Commission, and California Independent System Operator Corporation (ISO) for Establishment and Operation of a Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS).
https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/moa.pdf.

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	<p>deadlines for the AES Redondo plant is unwarranted and harmful to many surrounding communities. We strongly urge the Board to omit the AES Redondo Beach Generating Station from the proposed extension of the deadline.</p>	
004.01	<p>On behalf of the BCHD Board of Directors, I am writing in opposition to the proposed extension of the AES Redondo Beach power plant beyond its scheduled retirement date of December 31, 2020 given the continued health impacts associated with its operation.</p> <p>BCHD supported Redondo Beach’s grant request to the California Natural Resources Agency through Prop 68 for wetlands restoration and creation of open and green spaces on the AES Redondo Beach site. Additional park and open space will greatly enhance the quality of life and contribute to enhanced physical and social-emotional health outcomes. Along with the rest of the community, we look forward to the having the power plant decommissioned, remediated and transformed into open and green spaces as quickly as possible.</p> <p>We appreciate your consideration to not extend the operation of the Redondo Beach AES power</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.</p>

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	plant beyond December 31, 2020.	
005.01	<p>Today I am writing you to express my opposition of the recent recommendation by the California Public Utilities Commission and the Statewide Advisory Committee on Cooling Water Intake Structures, as well as the State Water Board proposed amendment to the OTC Policy consistent with Alternative 5, which extends the Ormond Beach and AES Redondo Beach Generating Stations compliance deadlines.</p> <p>The Ormond Beach generating station located in the City of Oxnard was expected to be retired at the end of 2020. The plant is located next to some of the lowest-income and most densely populated minority communities in Ventura County, who have been burdened by cumulative amounts of pollution from agricultural pesticides, Superfund toxic waste site, and industrial air pollution from the Port of Hueneme and other operations. As you know, the California Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 screening tool is used to help identify communities that are disproportionately burdened by multiple sources of pollution and with population characteristics that make them more sensitive to pollution. The Ormond Beach</p>	<p>Comment noted. Please see Master Responses 2.1, 2.4, and 2.5 and Sections 5.5 and 5.6 of the Staff Report for a discussion of environmental justice concerns.</p> <p>Please also see Master Response 2.6 regarding analysis of impacts.</p> <p>Currently, all fossil-fueled facilities emit air pollutants when operating. Additionally, greenhouse gas emissions generally do not have direct localized impacts; rather, they increase global atmospheric greenhouse gas levels. While increases in global atmospheric greenhouse gas levels can have local impacts, it is not possible to relate one OTC facility's greenhouse gas emissions to localized climate change impacts.</p>

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	<p>generating station has contributed to the pollution burden to our frontline communities that rank high on the CalEnviroScreen (i.e., an 80-85% overall local ranking). The plant is located in a census tract considered by the State of California to have a higher pollution burden than 98% of other areas in the state.</p> <p>Gas-fired generation plants are major polluters, harmful to the environment, and contribute to greenhouse gas emissions. Their operation exacerbates climate change. To ensure a climate resilient future, we must ensure our most vulnerable communities are considered. Your Board's proposed amendment to address grid reliability by extending compliance deadlines must consider the existing conditions to these communities, the current environmental justice concerns, as well as a longstanding and widespread community opposition to the ongoing concentration of fossil-fuel power plants along the Ventura County coast and Santa Monica Bay.</p>	
005.02	<p>In addition to impacting low-income minority communities that are already overburdened with pollution, the Ormond Beach generating station is also located in the Ormond Beach Wetland Complex, one of the largest wetland recovery</p>	<p>Comment noted. Please see Master Responses 2.3 and 2.4.</p>

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	<p>efforts in Southern California, and a biodiversity priority for the State Coastal Conservancy and The Nature Conservancy.</p> <p>The AES Redondo Beach Generating Station recently received a California Natural Resources Agency Prop 68 grant for wetland restoration and greenspace creation project on a portion of the site. This compliance extension would jeopardize priority biodiversity efforts and funding.</p>	
005.03	<p>My Board of Supervisors and our Board at the Clean Power Alliance is committed to providing our community's residents, businesses, and organizations with cleaner energy options. To echo this commitment, the County of Ventura adopted the default renewable rate of 100% clean energy locally, via the community choice aggregator. Our State's commitment to clean energy should not be hindered as will be the case with postponement of the compliance deadlines. Clean energy technology was acknowledged as a competitive alternative in the CPUC Rulemaking 16-02-007.</p> <p>South Oxnard and Redondo Beach residents are already impacted by excessive pollution, and we are facing a climate crisis that demands</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.5, and Sections 5.1 and 5.5 of the Staff Report. Please also see response to comment 005.01.</p>

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	<p>leadership to reverse our past ways that increase greenhouse gas emissions. That is why I request that your Board not extend the compliance date for the Ormond Beach power plant facility and Redondo Beach generating station. We need to act now to reduce the cumulative effects of pollution exposure to frontline communities and move to clean energy. Postponing the retirement of these plants would be counterproductive to local and State environmental goals and environmental justice concerns.</p>	
005.04	<p>As you know, the negative impacts of One-Through Cooling systems are well documented and the impetus for the introduction of the 2010 OTC Policy. I urge the Board to omit the Ormond Beach and AES Redondo Beach Generating Station from the proposed extension of the OTC Policy deadline.</p> <p>I further urge your Board to maintain the existing compliance dates that requires the fossil-fuel plant to shut down by December 31, 2020 to protect marine life in the Ventura County coast and Santa Monica Bay, address air pollution impacts on local communities, and uphold California's commitment to Climate and greenhouse gas reduction.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.5, and Sections 5.1, 5.2, and 5.6 of the Staff Report.</p>

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006.01	<p>The CalChamber and the organizations listed are particularly concerned about the implications of power shutoffs should the state fail to adequately plan for reliability shortfalls that are predicted to occur a mere 12-15 months from now.</p> <p>CalChamber and the California Manufacturers and Technology Association submit this attached letter providing comments to the draft amendments and supporting extensions of OTC compliance deadlines to meet temporary reliability needs. Even minor brownouts or blackouts have a devastating effect on the ability of companies to continue operations. The state has learned this lesson while trying to balance the need for public power shutoffs to prevent wildfires with the need for continuous power sources. Adding the burden of preventable, predictable power shutoffs unrelated to protecting imminent threats to human life and property cannot be the policy of our State.</p> <p>Moreover, concerns regarding power shutoffs are paramount as businesses adjust to altered operations, work locations, and priorities while responding to the COVID-19 crisis, the timing of which will likely overlap with energy shortfalls in 2021. As set forth below, we support modest, thoughtful extensions of compliance deadlines for Once Through Cooling (OTC) regulations until</p>	Comment noted. Please see Master Response 2.2.

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	<p>additional resources can be brought to bear to address this reliability shortfall in the longer term. Because this longer-term solution is currently underway, interim measures are necessary to ensure we do not suffer preventable economic impacts to businesses on top of those economic impacts already being heaped upon them by the COVID-19 crisis.</p>	
006.02	<p>It is important to remember that the facilities sought to be extended operate at a very low capacity factor—meaning that OTC compliance extensions do not lead to any approval to operate beyond the terms of their air-district approved air permit limits. Instead, for a short period of time, these plants will continue to act as a fast-ramping resource necessary to keep the lights on and will continue to do so at a fraction of their operating capacity. Extensions of up to three years will ensure we can keep the lights on and continue our economic recovery.</p>	<p>Comment noted. Please see Master Responses 2.2 and 2.5.</p>
006.03	<p>Objections to the extensions from various groups appear to be primarily focused on air emissions. These same objections were made and considered at the PUC, which noted that the air districts have authority over air emissions, and that the Water Board had authority over OTC</p>	<p>Comment noted. Please see Master Response 2.1 and 2.5.</p>

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	<p>compliance extensions. Ultimately, the PUC deferred to the Water Board for a decision on water quality concerns. While important, regulation of permitted air emissions is the jurisdiction of the local air quality management districts issuing permits, which issue strict limits and have significant penalties for non-compliance. The Water Board’s OTC extensions do not impact the air district’s ability to regulate air permits or penalize entities for non-compliance should allowable exceedances occur.</p>	
006.04	<p>As outlined in the staff report, impacts to marine life are expected to be at or below the assumptions that underlie the OTC Policy in the first place, with the resulting effect that the Water Board’s goals are not undermined by these modest extensions:</p> <p><i>“Impacts to marine life are expected to be at or below the baseline established in the 2010 Final SED if the compliance dates for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are extended for up to 3 years.”</i></p> <p>In addition, staff has noted that “the continued use of OTC waters from Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach will</p>	<p>Comment noted. Please see Master Response 2.3. Note that continuation of existing interim mitigation requirements does not constitute additional mitigation. Statements in the Staff Report regarding additional mitigation above and beyond that previously determined appropriate refers to commenters seeking new mitigation requirements for the extension period.</p>

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	<p>be subject to continued interim mitigation requirements as detailed in Resolution No. 2015-0057 up to and until the power plants come into compliance with the OTC Policy. Since the use of the aforementioned power plants is expected to be at or below recent levels, the interim mitigation requirements currently in place are sufficient to offset impingement and entrainment impacts incurred during the extended operation of the power plants, if approved.” This additional mitigation would be above and beyond what was determined appropriate by the board in implementing the OTC Policy.</p>	
006.05	<p>Brown outs and black outs have real consequences on residents and businesses alike. During the electricity crisis in 2000-2001, brown outs occurred with little notice. These brown outs threatened critical infrastructure, including equipment that cannot be shut down without adequate notice.</p> <p>Adding to this, if the state does nothing to abate this very real risk, businesses will be forced to hedge that risk by making expensive investments, diverting funds that could be used to recover from economic crisis, or expand job creation in California. With another wildfire season</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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	<p>approaching, the state already must balance wildfire risk with public safety power shutoffs. Adding to the burden reliability shortfalls resulting in additional potential outages is unacceptable. Failing to adequately prepare for reliability shortfalls could have devastating impacts on the ability of businesses to thrive.</p>	
006.06	<p>The COVID-19 crisis has devastated the California economy, and places a finer point on this issue. In this time where many employees are working from home or from alternate workplaces, will the risk of outages now fall on individuals to ensure energy reliability at their homes? How will the California economy even begin to recover if businesses and individuals now must prepare for an inevitability that was predicted by the State? We appreciate the thoughtful recommendations of staff but suggest that the Water Board consider a more conservative approach, ensuring the ability to rely upon these resources until 2023, the deadline for load serving entities to fully procure 100% of the capacity necessary to meet forecasted demand. This conservative approach will ensure sufficient reliability capacity, as well as contain costs.</p>	<p>Comment noted. Please see Master Response 2.2. Additionally, please see responses 001.02 and 001.07.</p>
006.07	<p>The impacts of additional power outages,</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2</p>

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	<p>especially ones that were predicted and preventable, will only further add to the economic challenges facing our state as we fight the COVID-19 virus. Because these plants will be adequately regulated by the air district, and because modest extensions do not undermine the long term goals of the OTC Policy, we strongly urge the Water Board to consider a conservative approach to solve this short term reliability problem by ensuring the ability rely upon these fast ramping, low capacity resources until 2023, at which time the additional procurement ordered by the PUC will be complete.</p>	<p>and 2.5.</p>
007.01	<p>The State Water Board took important action to protect California’s marine life by adopting the Once-Through Cooling (OTC) Policy in 2010 to phase-out all once-through cooling power plants due to their significant marine life mortality impacts. Nineteen California coastal and Delta power plants had previously used OTC systems that pulled in up to 16 billion gallons of marine waters every year. It is critical to recognize that the seawater withdrawn from coastal waters and into these plants “...is not just water. It is habitat and contains an entire ecosystem of phytoplankton, fishes, and invertebrates.”</p>	<p>Comment noted. See Master Response 2.3.</p>

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007.02	<p>Facilities have now had a full decade to come into compliance with the OTC Policy and end the devastating impacts to California’s coastal resources and communities. Any extensions to the current phase-out of OTC plants will unnecessarily harm marine life, interrupt the connectivity of California’s landmark marine protected area (MPA) network, impede air quality, and ultimately are not consistent with California’s greenhouse gas reduction goals. In considering the extension request for these power plants, the State Water Board has the sole responsibility of implementing and maintaining the integrity of the OTC Policy. The State Water Board must take the following actions, at a minimum, to ensure coastal communities and marine ecosystems are mitigated for the ongoing operation of these harmful power plants:</p> <ul style="list-style-type: none"> ➤ Require additional mitigation to bridge grid reliability needs and rectify the ongoing environmental harm caused by extending the OTC compliance schedule; and ➤ Limit any extension of the OTC Policy to the greatest extent practicable. 	<p>Please see Master Responses 2.1, 2.2, 2.3, 2.5, and 2.6. Additionally, please see Section 5.2 of the Staff Report which states that if future IRP processes by the CPUC show that the OTC units are no longer necessary to ensure system-wide grid reliability during the approved extended compliance date periods, owners and operators could elect to retire the units early.</p> <p>It is unclear whether the continued operation of select OTC facilities for grid reliability purposes would interrupt the connectivity of California’s MPA network. However, the OTC Policy clearly acknowledged the possibility of compliance date extensions and included interim mitigation requirements in part in order to address ongoing impacts of OTC use during the phase-in period for compliance.</p>
007.03	The State Water Board has an affirmative duty to protect the beneficial uses of the state’s waters,	Comment noted. Please see Master Responses 2.1,

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	<p>and the State Water Board has an instrumental role in ensuring that extensions for OTC power plants are not granted without adequate mitigation for the harm caused by the ongoing operation of these plants. Given that interim mitigation is already required by section 2.C(3) of the OTC Policy, we strongly encourage mitigation fees for any OTC extension to be increased to mitigate for the loss of marine life, impacts to California’s fisheries, the impacts to local communities, and to deter future extensions of these plants.</p>	<p>2.2, 2.3, and Section 5.4 of the Staff Report.</p>
007.04	<p>Today, nine of the original nineteen OTC power plants still operate and are scheduled to come in compliance with the OTC Policy within the next decade –four of which were scheduled to come offline by the end of this calendar year. If the State Water Board were to adopt Alternative 5, the recommendation that extends the compliance deadlines for Alamitos, Huntington Beach, and Ormond Beach for three years until December 31, 2023 and Redondo Beach for one year until December 31, 2021 as outlined in the Staff Report, the overall harm to California’s coast and marine life will increase by the potential intake of 100 million gallons of seawater annually—instead of ending the environmental degradation caused</p>	<p>Comment noted. Please see Master Response 2.3.</p>

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	by these plants altogether.	
007.05	<p>When mitigation costs per gallon were determined in 2015, the State Water Board was clear that the mitigation was not intended to fully mitigate ongoing OTC impacts, but rather to encourage power plants to meet compliance deadlines. Specifically, during the adoption hearing of Resolution No. 2015-0057, staff acknowledged that calculating mitigation based on a value of per million gallons is not the typical method of calculating mitigation fees; rather, mitigation is generally calculated based on the life of the project or the disturbance caused by the project as a whole. As was described by State Water Board staff during the August 18, 2015 hearing:</p> <p><i>“When [the State Water Board] adopted the Once Through Cooling Policy, it included the requirement that any facility that continues to operate after 2015 would have to pay some sort of mitigation based on an amount per million gallons. That was meant as an incentive for [owners and operators] to think about ending earlier and not waiting until the very end of their compliance schedule.”</i></p>	Comment noted. Please see Master Response 2.3.
007.06	The interim mitigation based on the per million	Comment noted. Please see Master Responses 2.1,

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	gallons calculation was imposed explicitly as an incentive to encourage facilities to come in compliance with the OTC Policy ahead of schedule – not as mitigation for additional extensions and use of these facilities. As we now see with the current extension proposals before the State Water Board, this incentive approach has proven to be unsuccessful.	2.2, and 2.3.
007.07	The current interim mitigation that is already required is insufficient to offset the continued operation of these facilities, and has failed to incentivize early compliance with the OTC Policy. The State Water Board should increase the mitigation fee required for the extended use of these plants to address both grid reliability and acknowledge the associated impacts to marine life, air quality, and land use from the continued operation of these plants beyond the current OTC compliance schedule.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.5, and 2.6. Any required mitigation for impacts to air quality and land use impacts are largely beyond the State Water Board’s regulatory authority.
007.08	Increased mitigation is needed to offset the full impacts any extension to the OTC Policy. The State Water Board has significant discretion to impose additional mitigation for the continued operation of OTC power plants, and we disagree with staff’s findings that “[a]dditional mitigation would be above and beyond what was determined	Comment noted. Please see Master Responses 2.3 and 2.6. Section 2.C.(3) of the OTC Policy requires owners and operators to implement measures to mitigate interim impingement and entrainment impacts resulting from cooling water intake structures, commencing on October 1, 2015 and continuing up until final compliance with the Policy. The OTC Policy indicates three options for

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	<p>as appropriate in Resolution 2015-0057, implementing the findings of the OTC Policy.” The Executive Director is explicitly authorized “to approve, on a case-by-case basis, mitigation measures that owners or operators of OTC facilities shall undertake to comply with requirements for interim mitigation,” and that all mitigation must be done “to the State Water Board’s satisfaction,” leaving the State Water Board with significant discretion to impose a higher mitigation fee than was previously calculated in 2015.</p>	<p>owners and operators to come into compliance with the interim mitigation requirements. Each option either requires that the owners and operators either demonstrate to the State Water Board’s satisfaction the measures are compensating for the impacts or require State Water Board approval. Owners and operators could also elect to comply via a combination of the interim mitigation options in Section 2.C(3) of the OTC Policy. In Resolution No. 2015-0057, delegating authority to the Executive Director, the State Water Board authorized the Executive Director to approve, on a case-by-case basis, mitigation measures that owners and operators of OTC facilities shall undertake to comply with requirements for interim mitigation. Furthermore, Resolution No. 2015-0057, set forth measures by which owners and operators could comply with the interim mitigation option in Section 2.C.(3)(b) of the OTC Policy, which are based on the findings of the ERP II. The ERP II developed a scientifically defensible calculation to determine the mitigation payment for OTC facilities that would compensate for continued intake impacts due to impingement and entrainment, which was the basis for the interim mitigation calculation method set forth in Resolution No. 2015-0057. Furthermore, Resolution No. 2015-0057 states that when site-specific entrainment data is available for a facility, the Executive Director shall determine whether this data is suitable for calculating a specific habitat production forgone for that plan.</p>

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		<p>Otherwise, owners and operators electing to comply with interim mitigation requirements consistent with Section 2.C.(3)(b), shall use the default method for calculating the entrainment component of the interim mitigation payment calculation. It is for these reasons that the State Water Board authorized the Executive Director to approve, on a case-by-case basis, the measures by which owners and operators proposed to comply with the interim mitigation requirements. Neither Resolution No. 2015-0057 nor the OTC Policy include provisions to increase interim mitigation requirements, or any additional payments if complying with Section 2.C(3)(b) of the OTC Policy when a compliance date is modified to ensure grid reliability.</p> <p>Furthermore, as noted in the 2010 Final SED, at the time of the proposed adoption of the OTC Policy, the State Water Board performed an environmental analysis of the reasonably foreseeable methods of compliance pursuant to Public Resources Code section 21159. This analysis was required to address the reasonably foreseeable environmental impacts of the methods of compliance and the reasonably foreseeable alternatives and mitigation measures. The State Water Board conducted this required analysis when adopting the OTC Policy in 2010.</p> <p>The current interim mitigation requirements, including the</p>

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		interim mitigation payment calculation method, are appropriate given the identified environmental impacts of impingement and entrainment associated with operation of OTC facilities and the conclusions of ERP II. Even assuming that existing mitigation requirements were insufficient, examining the possibility of increasing mitigation requirements would at minimum require a new data-based assessment in order to produce a scientifically-defensible quantification of mitigation payments. The commenter has provided no basis or data to support their claim that extension of these compliance dates would result in additional impacts to marine life. With respect to mitigation of other non-marine impacts associated with operation of OTC facilities, these are generally not within the State Water Board's regulatory authority.
007.09	The State Water Board has the discretion to assign mitigation fees on a case-by-case basis, and we strongly recommend the State Water Board double the mitigation fee by imposing a punitive fee on top of the already-calculated mitigation fee to mitigate for the comprehensive impacts of this extension.	Comment noted. Please see Master Responses 2.3 and 2.6, as well as response to comment 007.08. The current interim mitigation requirements, including the interim mitigation payment calculation methods, are appropriate given the identified environmental impacts of impingement and entrainment associated with operation of OTC facilities and the conclusions of ERP II.
007.10	Further, the OTC extension recommendations provided by SACCWIS are primarily centered on achieving grid reliability as new energy sources	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, 2.5, and 2.6.

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	come online, not the environmental impacts caused by the ongoing operation of these plants.	
007.11	<p>The consideration of impacts to water quality and the beneficial uses of California’s coastal waters, therefore, lands under the sole purview of the State Water Board and must be considered in any extension to the OTC Policy. As acknowledged and directed by Board Member Doduc during the State Water Board Meeting held on November 19, 2019, the State Water Board must:</p> <p><i>“[R]ecognize that the SACCWIS recommendations are based on their perspective, their analysis, their concerns and expertise with respect to power regulation and grid reliability. However, in considering any proposed changes to the OTC policy, ... we need to consider a broader basis of factors, including potential impacts to the community as well as what it means for the natural resources. ... Be mindful that we have other factors we need to consider in any proposed changes [to the OTC Policy].”</i></p> <p>The State Water Board must therefore consider the <i>full</i> range of impacts to marine</p>	<p>Comment noted. A full range of considerations are described in Section 5 of the Staff Report, which include additions to the March 24, 2020 Draft Staff Report on impacts to land use, air quality, and wetlands. Additionally, please see the Master Responses, which further discuss impacts associated with grid reliability in Section 2.2, marine life in Section 2.3, air quality in Section 2.5, and land use in Section 2.1. Finally, see Section 2.6 of the Master Responses regarding required analysis of environmental impacts in accordance with CEQA.</p>

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	<p>life and the other beneficial uses that California's ocean and estuarine waters support in any extension granted in an amendment to the OTC Policy. Vice Chair D'Adamo additionally expressed explicit interest in a "balanced packaged that addresses grid reliability, and also looks at these other issues of marine life, air quality, and land use" during the April 21, 2020 Workshop.</p>	
007.12	<p>We therefore recommend that the mitigation for the extended use of these plants be doubled to mitigate for the continued degradation of California's coast and marine life. Doubling the mitigation required for any OTC extension will provide a balanced approach to ensure grid reliability and offset the environmental harm caused by the continued operation of these plants.</p>	<p>Comment noted. Please see Master Response 2.3 and response to comment 007.08 and 007.09.</p>
007.13	<p>If the mitigation fee is not doubled as a condition to any OTC extension, we alternatively recommend the State Water Board recalculate the average entrainment and impingement fee based on an HPF estimate using a confidence level of 95 percent, and direct the Executive Director to calculate the entrainment and impingement fee for each individual OTC facility</p>	<p>Comment noted. Please see Master Response 2.3 and 2.6, as well as response 007.08. In particular, Master Response 2.3.2 describes the process for calculating interim mitigation payments, including the establishment and findings of the Expert Review Panel II. The panel developed a scientifically defensible mitigation calculation, including a default average cost of entrainment and average indirect economic value of the</p>

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	<p>using a confidence level of 95 percent for the ETM/HPF estimate.</p> <p>A 95 percent confidence interval is the appropriate level to ensure that the area affected by OTC operations is fully mitigated. As the State Water Board states it “is important to ensure that marine life mortality is fully mitigated.” However, using an APF equation to determine the size of a mitigation project causes some statistical uncertainty associated with the calculations of productivity forgone versus mortality associated with the facility. Using an average APF – as the State Water Board has done by means that there is a <u>50 percent chance</u> that a mitigation project will underestimate the mitigation area needed to fully compensate for a facility’s impacts. By using a higher confidence level, there will be a “greater likelihood that a mitigation project will fully compensate for a facility’s impacts.”</p> <p>As the State Water Board determined in the Desalination Amendment, including “a requirement that the APF be calculated using a one-sided, upper 95 percent confidence bound for the 95th percentile of the APF distribution is consistent with existing requirements in the Ocean Plan.” To be consistent with past determinations</p>	<p>fisheries, that compensates for continued intake impacts due to impingement and entrainment and is consistent with the requirements of the OTC Policy. The panel’s calculation uses empirical transport models coupled with the habitat production forgone method, and is based on the cost of creating or restoring habitat that replaced the production of marine organisms killed by entrainment. This methodology was used as the basis of State Water Board Resolution No. 2015-0057, which adopted the process to calculate annual interim mitigation payments.</p> <p>In adopting Resolution No. 2015-0057, the State Water Board noted that the mitigation requirements for desalination facilities were more stringent and intended to implement Water Code section 13142.5(b), which requires that new or expanded industrial installations using seawater for cooling, heating or industrial processing use the best available site, design, technology and mitigation measures feasible to mitigate intake and mortality of all forms of marine life for the life of the project. By contrast, the OTC Policy interim mitigation measures were included to compensate for the impacts to marine life by facilities that are actively working toward eliminating or minimizing use of OTC water.</p> <p>Responding to commenters on Resolution 2015-0057 who requested use of a 95% confidence interval, the State Water Board noted that application of this</p>

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	<p>as to the appropriate statistical certainty when developing a mitigation fee, the State Water Board should determine that a 95th percentile confidence level will be used when calculating the OTC mitigation fee. Therefore, the APF estimates used in the past mitigation fees (used to create the proposed average per gallon fee) should be recalculated using the 95% confidence interval, and the cost of mitigation adjusted upward in proportion to the adjusted APF estimate.</p>	<p>method would require new costing assessments, including reconvening the expert review panel, and could be complex and expensive, especially if suitable entrainment studies, to account for variation in oceanographic or hydrologic conditions and seasonal larval abundance and diversity such that abundance estimates are reasonably accurate, are not currently available for facilities. However, the Board noted that a 95% confidence level may be applied in cases where the Executive Director decides that it would be more appropriate to use available entrainment data that is representative of a plant's current operations to calculate its HPF and entrainment fee.</p> <p>The current interim mitigation requirements, including the interim mitigation payment calculation method, are appropriate given the environmental impacts of impingement and entrainment associated with operation of OTC facilities.</p>
007.14	<p>Compliance deadlines under the OTC Policy have been in place for the last decade, and given the multiple decades that these plants have continued to operate in violation of section 316(b) of the federal Clean Water Act, the State Water Board should limit any extension of an OTC power plant to the greatest extent practicable.</p>	<p>Comment noted. Please see Master Response 2.1.</p>
007.15	<p>Data produced by the California Energy</p>	<p>Comment noted. Please see Section 5.1 of the Staff</p>

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	<p>Commission has shown that the use of these four plants has decreased each year and were used at less than 10 percent capacity in 2018, with two of the four plants (Redondo and Ormond) used at a capacity of less than 2 percent. Despite publishing a report in March 2019 year that concluded that no OTC compliance deadline extensions would be necessary, the California Public Utilities Commission (CPUC) found that several compounding events, such as a delay in new energy procurement, would threaten system-wide grid reliability beginning in the summer of 2021. Specifically, the CPUC issued D.19-11-016 in November 2019 to address this shortfall, directing 3,300 MW of new energy capacity be procured by 2023, with 50% of this procurement due to come online by August 1, 2021, 75% by August 1, 2022, and 100% by August 1, 2023. To meet this energy need, SACCWIS recommended that the extension for each OTC power plant end on December 31st, rather than the procurement needs based on August 1st to ensure energy availability by operating these plants during times of peak demand.</p>	<p>Report and Master Response 2.2.</p>
007.16	<p>Given the declining use and overall need of these power plants, we support the Staff Report's</p>	<p>Comment noted. The Staff Report and Amendment have not been revised to state that facilities are required</p>

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	<p>finding that owners and operators may elect to retire units early upon a finding that the systems are no longer needed to ensure system-wide grid reliability. We request this language go further and require plants that are no longer needed to ensure grid reliability be retired, and that this language be explicit not only in the staff report, but be explicit in the Amendment itself to ensure these units are retired earlier than the extension deadlines, if these plants are not deemed necessary.</p> <p>Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling</p> <p>1. Introduction</p> <p><i>P. If OTC units are no longer necessary to ensure system-wide grid reliability during the approved extended compliance date periods, owners and operators shall retire the units early.</i></p>	<p>to retire if units are no longer necessary to ensure system-wide grid reliability during the approved extended compliance date periods.</p> <p>The proposed extended compliance dates ensure grid reliability during projected peak demand periods. As noted in Section 5.1 of the Staff Report, peak demand is projected to shift from August to September. Given this projection and other uncertainties, capacity from OTC facilities may be needed to maintain grid reliability. The proposed extended compliance dates do not preclude the generating stations included in the proposed OTC Policy amendment from retiring earlier if their capacity is deemed unnecessary by the energy agencies of the SACCWIS. Additional requirements for early retirement based upon multiple other agency actions or determinations, as set forth in the proposed language, could create unnecessary ambiguity for power generators subject to the requirements of the Policy.</p>
007.17	<p>Additionally, we urge the State Water Board to include the compliance deadlines for any units not included in the proposed extension to ensure that additional units do not inadvertently stay online beyond 2020. The SACCWIS recommendations only requested extensions of Alamitos Generating Station units 3-5, Ormond Beach Generating</p>	<p>Comment noted. The Amendment was revised to include the compliance dates for units whose compliance dates are remaining unchanged.</p>

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	<p>Station units 1 and 2, Huntington Beach Generating Station unit 2, and Redondo Beach units 5, 6, and 8. The implementation schedule in the OTC Amendment must reflect those units that SACCWIS did not recommend extensions for and are scheduled to come offline at the end of this calendar year.</p>	
007.18	<p>Finally, consistent with Board Member Doduc’s direction to staff during the November 19, 2019 Board Meeting, staff must consider the full suite of impacts to the coastal environment caused by the ongoing operation of each plant individually. The SACCWIS report and recommendations do not provide a full environmental analysis, if any at all, and instead focuses on ensuring grid reliability. We encourage the staff to provide a careful analysis of the varied impacts of each power plant when providing its final recommendation to the State Water Board to ensure the full impacts of these extensions is understood (for example, impacts on beneficial uses, land use, and air quality), associated mitigation is assessed, and alternative implementation schedules are considered to ensure plants that pose the least</p>	<p>Comment noted. Please see Sections 5.1, 5.5, and 5.6 of the Staff Report and response 007.11.</p>

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	amount of harm to the coastal environment, fisheries, and surrounding communities are extended –and thereby any extension of more harmful power plants is limited to the greatest extent that is practicable to protect California’s coast and coastal communities.	
007.19	California has long recognized the importance of protecting and enhancing our coastal and marine resources with the adoption of laws such as Coastal Act in 1976, Marine Life Protection Act in 1999, and adoption of the OTC Policy to phase out harmful power plants located along California’s coast. The State Water Board has an instrumental role in ensuring the continued phasing out of destructive OTC power plants by imposing strict standards and conditions on any extension that is granted to an OTC power plant. We strongly encourage your Board increase mitigation fees for any OTC extension that is granted to strike a balance between meeting statewide grid reliability needs, and to mitigate for the loss of marine life, impacts to California’s fisheries and local communities, and to ultimately deter future extensions of these harmful plants.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and Sections 5.1, 5.2, and 5.3 of the Staff Report. Please also see responses to comments 007.08, 007.11, and 007.13.
008.01	We are writing to oppose the recent	Comment noted. Please see Master Responses 2.1,

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	<p>recommendations by the Public Utilities Commission (PUC) and the Statewide Advisory Committee on Cooling Water Intake Structures to extend the Once-Through Cooling (OTC) Policy’s compliance deadline for the AES Redondo Beach power generating facility for an additional year. We urge the State Water Resources Control Board (Board) to maintain the current compliance date that requires the aged fossil fuel plant to shut down by December 31, 2020. Keeping this deadline will end the harmful impacts of OTC to the marine life of Santa Monica Bay, significantly reduce dangerous air pollution in the surrounding communities, and uphold California’s commitment to its climate and greenhouse gas reduction goals.</p>	<p>2.2, 2.3, and 2.5.</p>
008.02	<p>The Board implemented the OTC Policy in 2010 to combat the severe environmental impacts of OTC systems, which kill millions of fish and other marine organisms and discharge warm water back to the ocean contributing to algal blooms and further ecosystem degradation. These effects are often more pronounced in enclosed bays and estuaries such as Santa Monica Bay, where the Redondo Beach station is located.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.3.</p>
008.03	<p>Noise and air pollution from the Redondo Beach plant also have significant health and safety</p>	<p>Comment noted. Please see Master Responses 2.1 and</p>

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	impacts on the residents in surrounding communities. Dense residential communities surround the power station with over 21,000 people living within a mile of the plant. The aged natural gas plant is the leading contributor of fine particulate matter pollution in the area and second only to transportation in emissions of nitrogen oxides.	2.5.
008.04	Additionally, the Redondo Beach plant site includes six acres of wetlands, and historically the area was known as the Old Redondo Salt Lake. Due to the nature of the site, standing water is an ongoing safety hazard that requires AES Redondo Beach to dewater the site, degrading the existing wetlands and directly opposing California Coastal Commission requirements to preserve those wetlands.	Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report for a discussion of land use impacts.
008.05	With the current deadline, the City of Redondo Beach has received a \$4.8 million grant from the California Natural Resources Agency through Proposition 68 for a wetland restoration and greenspace creation project on a portion of the site. The proposed one-year compliance deadline extension could jeopardize this funding since it is only available for sites of fossil fuel power plants	Please see Master Response 2.4 and Sections 5.3 and 5.5 of the Staff Report.

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	scheduled to retire prior to January 1, 2021.	
008.06	<p>The OTC compliance deadlines have been known for a decade and already extended multiple times for several power plants. Extending them again for the AES Redondo Beach plant is both unnecessary and harmful. The concerns brought forth by the PUC over power supply reserves and grid reliability can readily be met by the power plants, which have negotiated with their communities to extend their operations and to offset impacts on nearby residents and the environment.</p> <p>For these reasons, we urge the Board to omit the AES Redondo Beach Generating Station from the proposed extension of the OTC Policy deadline.</p>	Please see Master Response 2.2. Moss Landing Power Plant, Haynes, Scattergood, and Harbor generating stations, and Encina Power Station are the only facilities under the OTC Policy that have previously had compliance date extensions approved by the State Water Board. This Amendment is the first time that Redondo Beach’s compliance date has been recommended for extension.
009.01	I am writing on behalf of the 1712 constituents listed below who have written me in support of my bill AB 2071, which seeks to maintain the current Once-Through Cooling (OTC) Policy compliance deadline for the AES Redondo Beach that requires the aged fossil fuel plant to shut down by December 31, 2020. We oppose the recent recommendations by the Public Utilities Commission and the Statewide Advisory Committee on Cooling Water Intake Structures to	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5. The State Water Board recognizes the controversial nature of extending OTC Policy compliance dates for certain facilities and the concerns of communities located near power plants. The State Water Board has the discretion to and, to the extent practicable, will consider these issues. However, the State Water Board’s primary responsibility and jurisdiction is to implement CWA 316(b) and ensure the beneficial uses of the state’s coastal and estuarine

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	<p>extend the Once-Through Cooling (OTC) Policy’s compliance deadline for the AES Redondo Beach power generating facility for an additional year. We urge the State Water Resources Control Board (Board) to maintain the current compliance date that requires the aged fossil fuel plant to shut down by December 31, 2020. Keeping this deadline will end the harmful impacts of OTC to the marine life of Santa Monica Bay, significantly reduce dangerous air and noise pollution in the surrounding communities, and uphold California’s commitment to its climate and greenhouse gas reduction goals. My constituents and I urge the Board to omit the AES Redondo Beach Generating Station from the proposed extension of the OTC Policy deadline.</p>	<p>waters are protected, while also ensuring that the electrical power needs essential for the welfare of the citizens of the state are met.</p>
010.01	<p>Oxnard was grateful for this progress in ending once-through cooling plants. Unfortunately, the closure of the Mandalay Beach plant did not include a plan to dismantle the plant. Oxnard simply does not have the money to do it, and hence it could, like multiple other closed plants in California, remain a standing, rusting monument to the 20th Century for many years to come.</p> <p>We now have the possibility to not let that happen to the Ormond Beach power plant once</p>	<p>Comment noted.</p>

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	operations cease.	
010.02	<p>This is a one-time, one-shot opportunity for the Oxnard community to actually dismantle one of the power plants that bookend our coastline. The Oxnard City Council has made public policy establishing almost all of Ormond Beach for open space resource protection. Over the years the City has partnered with The Nature Conservancy and the State Coastal Conservancy to acquire hundreds of acres to protect this area for wildlife, ecology, and wetlands restoration.</p> <p>In your efforts to implement statewide policies to improve California, please take into account the lasting local impact. After more than half a century, Oxnard deserves our one chance to remove at least one of the two towering power plants on our otherwise pristine beach.</p> <p>We respectfully request that the Board accepts staff recommendation to extend the Ormond Beach plant closure through 2023.</p>	Comment noted. Please see Master Response 2.1.
011.01	As a Councilmember for the City of Beverly Hills, I urge you to reject the recent recommendation by the Statewide Advisory Committee on Cooling Water Intake Structures to extend the deadline for	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>compliance with the current Once Through Cooling (OTC) Policy for the AES Redondo Beach power generating facility.</p> <p>I am requesting the State Water Resources Control Board reaffirm the current timeline for AES to shut this aged fossil fuel facility down by December 31, 2020. This facility is located in one of the most densely populated communities in California, with roughly 21,000 people living within a one-mile radius. The State Water Board's 2010 Supplemental Environmental Document assessed the Redondo Beach station as one of the least efficient plants in the state, producing more cooling water discharge per unit of energy generated than the combined rating of other similar facilities in Alamitos, Huntington Beach, and Ormond Beach.</p>	
011.02	<p>Section 316(b) of the Clean Water Act requires that Once Through Cooling (OTC) facilities implement the best technology available to minimize adverse environmental impacts. Granting this facility a one-year extension would allow the owners of this facility to continue with business as usual, thereby exposing neighboring residents to harmful fine particulate matter, NOx</p>	Please see Master Responses 2.1 and 2.5.

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	emissions and harmful risk to poor water quality.	
011.03	The OTC compliance deadlines have been known for a decade and there have been a sufficient of extensions for several power plants, including the Redondo Beach facility, to come into compliance. Grid reliability concerns can be addressed by tapping additional capacity from the remaining generation facilities.	Please see Master Response 2.2 and response to comment 008.06.
011.04	Our City has long been an advocate for a healthy environment. In 2017, the City joined the Mayors National Climate Action Agenda, which consists of mayors from across the United States working together to address climate change and strengthening local efforts to reduce greenhouse emissions. One of the initiatives for the Mayors National Climate Action Agenda is to ensure Climate equity and environmental justice.	Comment noted.
011.05	For these reasons, I am requesting you to reject the recent recommendation by the Statewide Advisory Committee on Cooling Water Intake Structures to extend the deadline for compliance with the current OTC Policy for the AES Redondo Beach power generating facility.	Comment noted. Please see Master Response 2.1 and 2.2.
012.01	On behalf of the entire City Council of the City of	Comment noted. Please see Master Responses 2.1,

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	<p>Hermosa Beach, I respectfully write to express our opposition to the proposed extension of operations at the AES Redondo Beach power plant located at 1100 North Harbor Drive in Redondo Beach. This extension was recommended for your consideration by the California Public Utilities Commission at their November 7, 2019 meeting. We submit this letter for your consideration on this matter when it comes before your Board in July. These units and this plant should be retired as scheduled by The State Water Resources Control Board in 2010 on December 31, 2020.</p> <p>The cities of Redondo Beach and Hermosa Beach have been working for many years to ensure this facility cease its operations and transition the site to a more beneficial use. Redondo Beach has spearheaded these efforts and the City of Hermosa Beach has worked closely with Redondo toward the same goals. The site is located directly across the street from Hermosa Beach’s southern border and has been a concern in our community for its deleterious effect on our environmental health and quality of life.</p>	<p>2.2, 2.3, and 2.5. While the CPUC recommended compliance date extensions for OTC facilities, the SACCWIS advises the State Water Board on the implementation of the OTC Policy. The SACCWIS adopted the January 2020 SACCWIS Report on January 23, 2020, which recommends extending compliance dates for Alamitos, Huntington, Ormond, and Redondo Beach.</p>
012.02	The continued efforts of the City of Redondo Beach have been vital in finally bringing the	Comment noted. Please see Master Response 2.1 and

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	<p>imminent closure of this locus of blight. Currently, the facility is scheduled to close at the end of 2020 –only a few short months from now. In addition, a private party has purchased the property with the aim of redevelopment. The City of Redondo Beach has additionally been awarded a State grant of nearly \$5 million to purchase portions of the land to become open park space and established an Enhanced Infrastructure Financing District to benefit the site’s future development. We request that you oppose this extension of operation of AES Redondo Beach, as detailed above, and allow these 50 acres to finally become a source of pride and boon to the region’s health and quality of life.</p>	<p>2.4.</p>
<p>013.01</p>	<p>I respectfully write to express my opposition to the proposed extension of operations at the AES Redondo Beach power plant located at 1100 North Harbor Drive in Redondo Beach.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border and sits across the street from many Hermosa Beach homes.</p>	<p>Please see Master Response 2.1.</p>
<p>013.02</p>	<p>There are concerns about local air pollution and carbon emissions from the aging units which</p>	<p>Comment noted. Please see Master Responses 2.1 and</p>

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	<p>would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. A previous health impact study conducted by the City of Hermosa Beach found-even at 5% production-the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. Any extension of its operations will have a significant negative impact on our residents and businesses.</p>	<p>2.5.</p>
<p>013.03</p>	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.</p>
<p>013.04</p>	<p>It's also clear that air quality in our City and the surrounding area will improve significantly when this plant is permanently closed, and the public's health will benefit.</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant. We hope that you join us in supporting the retirement of AES by 12/31/2020</p>	<p>Comment noted. Please see Master Response 2.1, 2.2, and 2.5.</p>

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	and not consider granting any extensions.	
014.01	<p>The City has reviewed the proposed OTC Policy Amendment and Staff Report and writes to express its adamant opposition to any extension of the compliance deadline for the AES Redondo Beach Generating Station (AES Redondo Beach). The City urges the Water Board to adopt an alternative that does not extend the compliance deadline for AES Redondo Beach and also to direct the Los Angeles Regional Water Quality Control Board (Regional Board) to investigate taking jurisdiction over the wetlands (Old Salt Lake) pursuant to the Porter-Cologne Water Quality Control Act.</p> <p>The following persons and entities also submitted comment letters to the Water Board opposing any extension of the deadline for AES Redondo Beach: State Assembly member Al Muratsuchi; State Senator Ben Allen; Los Angeles County Supervisor Janice Hahn - Fourth District; the City of Hermosa Beach; Mayor of Torrance Pat Furey; the Redondo Beach School Board; the Hermosa Beach School Board; Ventura County Supervisor Linda Parks- Second District; City of Beverly Hills Councilmember Julian A. Gold, M.D.; and the</p>	Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.

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	<p>Beach Cities Health District, and many others.</p> <p>The City asks the Water Board to maintain the existing compliance deadline that requires the antiquated AES Redondo Beach plant to cease operations this December in order to protect wetlands and marine life, as well as to prevent air pollution impacts on residents of the City and the surrounding communities.</p>	
014.02	<p>AES Redondo Beach is the oldest and least efficient of the four once-through-cooling (OTC) facilities under consideration in the proposed amendment to the existing OTC Policy. The operations at AES Redondo Beach, which have been described (until very recently) by the owner as presenting an imminent and substantial risk to human health and safety, are causing significant harm to the environment. The operations at the power plant are causing unpermitted degradation of the acres of wetlands on which the plant is located. AES Redondo Beach produces more air pollution per megawatt-hour (MWh) generated than the other three plants. Moreover, the topology of the area causes this air pollution to accumulate and stagnate along the coast, rather than dissipate. AES Redondo Beach pollutes the environment in one of the most densely populated</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5. Please also see response to comment 007.11.</p>

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	<p>communities in California, with more than 21,000 people living within one mile of the plant and enormous summer crowds at the adjacent beach. The plant also requires more OTC intake water and produces more cooling water discharge per unit of energy generated than the other three plants combined.</p> <p>The above detrimental environmental impacts can be avoided because AES Redondo Beach is unnecessary to ensure the reliability of California’s electrical supply. Extending the compliance deadlines of the Alamitos, Huntington Beach, and Ormond Beach power plants, as proposed in the Staff Report, already provides more than enough electrical capacity needed to maintain system-wide grid reliability.</p> <p>The City and its residents have anticipated the closure of AES Redondo Beach for nearly a decade. In the mid-2010s, the City and its residents mounted an extraordinary campaign to oppose AES Redondo Beach’s application to build a new power plant at the site, and were successful in convincing AES Redondo Beach to abandon its plans for the plant. Given that AES Redondo Beach is unnecessary to meet the State’s energy demands, the Water Board should</p>	

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	<p>not sacrifice water and air quality impacts in our community by extending the power plant's OTC Policy compliance deadline for even one year. Because the AES Redondo Beach capacity can be covered by the remaining plants, AES Redondo Beach should be closed as soon as possible, as it is the least efficient and most environmentally damaging of the four power plants under consideration for an extension.</p>	
014.03	<p>Extending the deadline for AES Redondo Beach is inconsistent with protecting the environment because operations at AES Redondo Beach cause (a) unpermitted degradation of wetlands; (b) severe localized air pollution; and (c) damage to marine life.</p> <p style="padding-left: 40px;">a. <u>AES Redondo Beach Causes Unpermitted Degradation of Wetlands</u></p> <p>The Staff Report has not addressed the illegal degradation of at least 5.93 acres of wetlands caused by AES Redondo Beach's operations at the site.</p>	<p>Comment noted. Please see Sections 5.3, 5.5, and 5.6 of the Staff Report and response to comment 001.38. Please also see Master Response 2.1, 2.2, 2.3, 2.4, 2.5, and 2.6.</p>
014.04	<p>In January 2014, a Coastal Commission staff ecologist visited the AES site and determined that—despite the many years of development at</p>	<p>Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report for a discussion of land use impacts. Additionally, the recent NOV submitted by</p>

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	<p>the site—the tank basins contained approximately 5 to 6 acres of Coastal Commission-jurisdictional wetlands. Energy Commission staff conducted a more detailed review and determined that there were 5.93 acres of jurisdictional wetlands. The Coastal Commission confirmed this determination when it issued its final “30413(d) Report” in July 2015.</p> <p>At approximately the same time, the dewatering system broke down and water began accumulating in the tank basins. In the latter half of 2014, AES removed the water pumps and installed new ones without obtaining a Coastal Development Permit (CDP), in violation of the Local Coastal Program (LCP) and the Coastal Act. While the dewatering system was out of commission, the tank basins began filling with water and the historic wetlands habitat began to flourish and expand, as demonstrated in the photograph below:</p> <p>In August 2015, the Coastal Commission sent a notice of violation letter to AES demanding that AES stop all dewatering activity and apply for a</p>	<p>the Coastal Commission to AES indicates that the pumps employed by AES constitute development and therefore require a CDP. The Coastal Commission also stated that the fact that AES has asserted that it no longer needs to continue operating the dewatering system does not obviate the need for AES and/or the new owners to obtain a CDP for the initial installation/operation of the dewatering system, and obtain either an ATF CDP to retain the dewatering system or a CDP for its removal. In the NOV, the Coastal Commission provided: potential enforcement remedies; resolutions to unpermitted development and violations of the Coastal Act and LCP; details on the violations of the Coastal Act and LCP; and background on the issue at hand.¹⁰</p>

¹⁰ California Coastal Commission. May 26, 2020. Notice of Violation (Violation File No. V-9-20-0041).

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	<p>CDP to remove the illegally installed pumps. (A copy is attached to this comment letter as Exhibit 1.) After the City began increasing enforcement pressure, AES applied for and received 60-day emergency CDP in August 2017. The emergency CDP was granted on the condition that, prior to the expiration of the emergency CDP, AES would submit a regular (non-emergency) CDP application to either authorize the existence and operation of the dewatering system or remove the system. AES failed to comply with this condition. Instead, AES applied for and received two 60-day extensions of the emergency CDP, each on the condition that AES would submit a regular CDP application prior to expiration of the emergency CDP. AES did not comply. It requested a fourth consecutive emergency CDP and was denied.</p>	
014.05	<p>In its applications for the emergency CDPs, AES alerted the City that the water accumulating in the tank basins created a significant hazard that interfered with the safe operation of the power plant:</p> <p><i>“The Flooded Areas present an imminent and substantial risk to human health and safety, including risks relating to grounds, faults, arc flash, and electrocution, which in turn present</i></p>	<p>Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report for a discussion of land use impacts.</p>

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	<p><i>substantial and imminent risks associated with electric reliability and operations at the Facility.</i></p> <p>In May 2018, representatives of the City and the California Coastal Commission were present for a tour of AES Redondo Beach. In a joint letter dated June 15, 2018, the Coastal Commission and City both expressed their “alarm regarding the potentially dangerous conditions AES reported ... during the visit,” in part, because the representatives were “repeatedly told that the conditions at the site were potentially very dangerous to employees and the public, as a result of water flooding underground tunnels containing high voltage wires.”</p> <p>Under pressure from the City, AES finally submitted an application for a regular CDP in April 2019. In May 2019 the City notified AES that the application was incomplete. AES did not provide the materials needed to complete the application, and it formally withdrew the application in April 2020.</p> <p>In its letter withdrawing the CDP application, AES suddenly reversed its long-held position that the water accumulating in the tank basins is a serious</p>	

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	<p>hazard. It asserted, “The plant has fully addressed the previous [water hazard] issue by installing a system of portable pumps to remove water in the electrical vaults when necessary to mitigate water infiltration, which allows for continuous safe operation of the plant.” The City has been provided with no evidence to support the assertion that the facility is now safe. Moreover, it is not at all clear why using the new “portable pumps” to dewater the tank area does not constitute a new violation of the LCP and the Coastal Act.</p> <p>The City responded on May 14, 2020, with a letter notifying AES that it was still in violation of the LCP and Coastal Act for two reasons: (1) the dewatering system remains in place and constitutes unpermitted development in the Coastal Zone; and (2) the use of portable pumps to dewater the vaults is likely a new violation of the LCP and the Coastal Act.</p> <p>Since 2015, AES has periodically operated the dewatering system, without notice to the City. AES conducted significant dewatering as recently as February of this year, as was demonstrated by the comments and materials presented at the April 21, 2020 workshop. The following two images provided to the Water Board by the South</p>	

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	<p>Bay Parkland Conservancy show that the dewatering activity dropped the wetlands water depth by approximately two feet in less than a week at the AES Redondo Beach site.</p> <p>In response to the City's request for assistance pursuant to Public Resources Code Section 30810, the Coastal Commission is preparing to send a new Notice of Violation to AES, demanding that AES cease all pumping and take immediate action to remove the dewatering system.</p>	
014.06	<p>The City believes it is probable that since the issuance of the 30413(d) Report by the Coastal Commission in 2015, additional wetland acreage has reestablished on the property. In addition, these wetland areas may be subject to Regional Board jurisdiction as "waters of the State" as defined by the Porter-Cologne Act. These areas are subject to ponding and provide beneficial uses as defined in the Los Angeles Basin Plan, specifically for wildlife such as waterfowl. It is not known what direct effect the dewatering has caused to the water table and indirectly to the wetlands. The Water Board should therefore consider whether the wetlands (Old Salt Lake) also falls within the permitting and</p>	<p>Comment noted. Please see Section 5.5 of the Staff Report for a discussion of land use impacts.</p> <p>Determining whether Old Salt Lake falls within the jurisdiction of the Los Angeles Regional Water Board is outside the scope of the Amendment, and would require a separate proceeding.</p> <p>Additionally, the Amendment does not absolve AES and SLH from complying with all existing and relevant permits, laws, and regulations.</p>

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	<p>enforcement jurisdiction of the Regional Board.</p> <p>In making its recommendation to the Water Board, the California Public Utilities Commission (CPUC) expressly stated that it “trusts that the Water Board will take [the issue of the safety of the dewatering system used at the Redondo Beach facility] into consideration when deciding whether to extend the OTC compliance deadline for the Redondo Beach facility.” (CPUC Decision, 19-11-016, pp. 67-68, emphasis added.) The Staff Report makes no mention of the dangerous conditions existing at AES Redondo Beach or the degradation of wetlands caused by its operation. The City implores the Water Board to seriously consider this issue.</p>	
014.07	<p>If the pumping persists, it will likely result in an enforcement action by the City, the California Coastal Commission, or both. Nor is it accurate to state that any additional protections will be provided to the wetlands as part of the sale of the property. The City and the new owners have failed to reach any agreement on protection of the wetlands at the site.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2 and 2.4, as well as Section 5.5 of the Staff Report for a discussion of land use impacts. Additionally, other regulatory actions, including enforcement, pursuant to the Coastal Act are outside the scope of the Amendment and the authority of the State Water Board.</p>

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	<p>At the July 8, 2015 Coastal Commission meeting regarding a Proposal to Upgrade the Redondo Beach Generating Station, Tom Luster, Senior Environmental Scientist, stated: “Regarding the Wetlands this is basically a case of nature battling last. The Wetlands continue to persist despite there being a thin layer of fill placed over them a number of years ago.”</p> <p>The Water Board should let nature continue its “at bat” and not permit AES Redondo Beach’s operations to continue to degrade the wetlands for even one more year.</p>	
014.08	<p>As shown in these tables, in the year 2006, despite producing less than half the energy output of the Alamitos and Huntington Beach facilities, AES Redondo Beach still emitted more nitrogen oxide, carbon monoxide, and fine particulate matter than each of those facilities. On a per unit of energy basis, AES emits more greenhouse gases than the other three facilities and more criteria pollutants than the other three facilities combined.</p> <p>The Staff Report does not suggest that the AES Redondo Beach facility has become more efficient in the decade plus since the SED was published.</p>	<p>Comment noted. Please see Master Responses 2.2 and 2.5. Additionally, Section 5 of the Staff Report does not suggest that the Redondo Beach facility has become more efficient in the decade since the 2010 Final SED was published; however, it notes that baseline impacts are expected to be at or below the baseline established in the 2010 Final SED in regards to marine life, water quality, air quality, aesthetics, and noise. Furthermore, abnormal startups do not necessarily reflect facility efficiency.</p>

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	<p>As noted at the April 21, 2020 workshop, in 2019 alone the AES Redondo Beach facility had at least two “abnormal startups” that resulted in panicked community members overwhelming the City’s 911 services with calls regarding the situation.</p>	
014.09	<p>As we learn more about the harmful effects of these pollutants, AES Redondo Beach’s inefficiencies become even more alarming. A recent Harvard study links poor air quality to increased mortality rates from COVID-19. The study specifically references power plants as producing fine particulate air pollution that contributes to the higher mortality rate, as follows:</p> <p><i>“People with COVID-19 who live in U.S. regions with high levels of air pollution are more likely to die from the disease than people who live in less polluted areas, according to a new nationwide study from Harvard T.H. Chan School of Public Health. The study is the first to look at the link between long-term exposure to fine particulate air pollution (PM2.5)—generated largely from fuel combustion from cars, refineries, and power plants—and the risk of death from COVID-19 in the U.S.” (Emphasis added.)</i></p>	<p>Comment noted. Please see Master 2.1. Additionally, please see Master Response 2.5 for a discussion of air quality impacts. Impacts on tourism are outside the scope of the Amendment.</p>

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	<p>The fact that AES Redondo Beach is located in one of the most densely populated communities in California amplifies these concerns. The City of Redondo Beach has 11,000 residents per square mile. Directly across the street from AES Redondo Beach is City of Hermosa Beach - the most densely populated community on the California Coast. Hermosa Beach has over 13,000 residents per square mile. Additionally, more than 6,500 Redondo Beach students report to schools located within 1.5 miles of AES Redondo Beach. A 2015 study, reflected in the chart below, found that there were an estimated 21,632 people living within one mile of AES Redondo Beach, which is about 500 more people than the other three plants at issue, combined.</p> <p>As that study noted, the vast majority of power plants are sited in locations with very low population density as they should be. Of the 102 power plants that were analyzed, 46 were located at sites with surrounding populations of less than 1,000; 85 had populations of less than 10,000; and only 6 (including Redondo Beach) had populations above 20,000.</p> <p>Those population numbers do not include the millions of people that visit the City and the</p>	

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	<p>neighboring City of Hermosa Beach each year. Combined, Redondo and Hermosa Beaches have averaged over 6.6 Million visitors each year. The photographs below further demonstrate pollution emitted from the AES Redondo Beach facility.</p>	
014.10	<p>In the hottest summer months (when peaker plants are most likely to run) Redondo and Hermosa Beaches have averaged nearly 1.7 Million visitors during the month of July and nearly 1.07 Million visitors during the month of August alone. Unfortunately, operating AES Redondo Beach on a hot summer day ensures that the pollution emitted from the plant affects the maximum number of people because hot summer days are when individuals from the community and visitors, including those from nearby disadvantaged communities, are most likely to be at the beach (see photograph below).</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5. Please also see Sections 5.5 and 5.6 of the Staff Report for a discussion of environmental justice issues and responses to comments 005.01 and 014.09.</p>
014.11	<p>Furthermore, the air impacts caused by AES Redondo Beach are significantly amplified by the unique meteorological conditions and terrain features at Redondo Beach. There is a nearly 200-foot high bluff within the City just east of the plant. (See figure below.) The bluff prevents the air pollution emitted by the plant from dispersing,</p>	<p>Please see Master Response 2.5.</p>

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	<p>and causes the air pollution to stagnate in densely populated Redondo Beach and Hermosa Beach. Moreover, the conditions at Redondo Beach sometimes cause pollution to travel offshore during the night and return to shore at ground-level during the day, where they stagnate. These conditions were brought to the attention of the California Energy Commission during AES' failed attempt to obtain certification to build a new plant at Redondo Beach. These unique conditions have not been addressed in the Staff Report.</p>	
014.12	<p>In addition to the air pollution created by AES Redondo Beach, the plant is also a large source of noise complaints from City residents. A snapshot of the large number of noise complaints the City received as a result of the plant is attached as Exhibit 4.22. AES Redondo Beach was never designed for use as a peaker plant, as is envisioned in the proposed OTC modification. Like most of the units under consideration, AES Redondo Beach was designed to be a 'load-following' plant that operates constantly and spins up and down as demand from the grid increases and decreases. It was not designed to start-up on short notice and so can take up to 24 hours to start-up, thus explaining why upset conditions often occur during start-up. Upset conditions</p>	<p>Comment noted. Please see Section 5.6 of the Staff Report and response to comment 014.08. Please also see Master Responses 2.1, 2.2, and 2.5.</p>

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	<p>cause noisy pressure relief valves to trigger all hours of the day and night, and the plant to emit the black smoke seen in the photographs herein.</p> <p>This Board should not allow AES Redondo Beach to continue to pollute our environment for even one additional year.</p>	
014.13	<p>AES Redondo Beach is not in compliance with the OTC Policy and is scheduled to retire on or before December 31, 2020. The Staff Report does not provide any valid reason to extend the compliance date for AES Redondo Beach.</p>	<p>Please see Sections 5.1, 5.2, and 5.7 of the Staff Report. Please also see Master Responses 2.1 and 2.2 for a discussion of the intent of the OTC Policy, compliance with the OTC Policy, and justification for the proposed OTC Policy amendment.</p>
014.14	<p>According to Figure 11 of the SED, AES Redondo Beach is one of, if not the, least efficient plants in all of California, producing more cooling water discharge per unit energy generated than Alamitos, Huntington Beach, and Ormond Beach, combined.</p> <p>The chart below from the SED demonstrates how inefficient the AES Redondo Beach facility is compared to other OTC plants in California.</p>	<p>Comment noted. Please see Master Response 2.2.</p>
014.15	<p>The Water Board should not just dismiss these water pollution concerns. AES Redondo Beach discharges into King Harbor and continues to pose a danger to the larger Santa Monica Bay's</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.3. Master Response 2.3.1 discusses the regulation of discharges from OTC facilities through National Pollutant Discharge Elimination System permits.</p>

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	<p>beneficial uses. These important beneficial uses included recreational activities, ocean life, and endangered species. Moreover, King Harbor is impaired by toxic pollutants including DDT and PCBs. Water Board documents indicate that AES Redondo Beach is permitted to discharge up to 898 million gallons per day of waste consisting of OTC water, treated chemical metal cleaning wastes, groundwater seepage, and other low volume wastes into Santa Monica Bay. An additional year of discharges from AES Redondo Beach will result in continued exceedances of these toxic chemicals into King Harbor, further impacting its beneficial uses.</p>	<p>Please also see responses to comments 007.11 and 014.08.</p>
014.16	<p>The intent of the OTC Policy “is to ensure that the beneficial uses of the State’s coastal and estuarine waters are protected while also ensuring that the electrical power needs essential for the welfare of the citizens of the State are met.” (OTC Policy, ¶ 1(G).) Extending the compliance deadline for AES Redondo Beach would frustrate that intent. The continued operation of AES Redondo Beach endangers the coastal and estuarine waters of the State, and the Staff Report cites no evidence that doing so is necessary to ensure a reliable electric grid.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.6.</p>

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014.17	<p>In fact, the Staff Report states that the Alamitos, Huntington Beach, Ormond Beach, and AES Redondo Beach plants are expected to be used “primarily as peakers and would be expected to run at or below their current operating capacity,” which over the past three years has been 4.8% of capacity. (Staff Report, p. 13.) Based on an analysis of information provided in the March 8, 2019 Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) report, the AES Redondo Beach units being considered for extension only ran at 2.6% capacity from 2016 through 2018. This analysis suggests that AES Redondo Beach is not needed to maintain system-wide grid reliability.</p>	Please see Master Response 2.2.
014.18	<p>Furthermore, the reasoning in the Staff Report ignores that AES Redondo Beach is more harmful to coastal waters than the other three plants combined. If each of the four plants were to produce one megawatt (MW) of energy, AES Redondo Beach would be responsible for more than half of the total intake water required by the four plants to produce the four MW of energy. If AES Redondo Beach were to retire, the same four MW of energy would be generated by the remaining three OTC plants with only half as</p>	Comment noted. Please see Sections 5.1 and 5.3 of the Staff Report, as well as Master Responses 2.1, 2.2, and 2.3.

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	<p>much intake water needed.</p> <p>While California has made great strides in reducing the overall ocean water usage by OTC plants since the adoption of the OTC Policy in 2010, the work is not done. (Staff Report, p. 14.) The harmful effects caused by AES Redondo Beach have persisted long enough and it should be required to comply with the OTC Policy by the current deadline.</p>	
014.19	As explained below, AES Redondo Beach is not needed to meet this potential shortfall and its compliance date should not be extended.	Please see Master Response 2.2.
014.20	<p>For example, the CPUC required Clean Power Alliance (CPA) to procure at least 98.4 MW of new capacity by 2021. On April 2, 2020, CPA approved the 100 MW Luna Storage standalone battery project that will provide new procurement by August 2021. Then, on May 7, 2020, CPA, on a motion made by City of Redondo Beach Councilmember Christian Horvath in his role as a Director of CPA, approved two additional projects, Sanborn Storage (100 MW) and the High Desert Storage Portion (50 MW), which will result in a surplus of 160.4 MW in 2021 above and beyond the 98.4 MW ordered by the CPUC. Subtracting</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5. Please also see responses to comments 007.11 and 014.08.</p> <p>Additionally, uncertainties stated in Section 5.1 of the Staff Report reinforce the need for RA capacity while new resources are procured, and the generation assets of one LSE may be needed to maintain grid reliability in the BAA as a whole. Furthermore, accelerated procurement or over-procurement by one LSE does not mean that all LSEs will collectively meet their RA requirements on time.</p> <p>With regards to potential shortfalls in 2021, the</p>

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	<p>the new non-OTC generation ordered by the CPUC leaves a potential shortfall of between 650 and 2,750 MW. Accepting the CPUC’s very conservative assumptions, the 2,750 MW shortfall can be covered by an extension of the Alamitos, Huntington Beach, and Ormond Beach OTC plants, without a need to delay retirement of the AES Redondo Beach units for insurance.</p> <p>Combined, the four OTC facilities at issue can produce approximately 3,742 MW. The amount of capacity available from each generating station is shown in the following chart.</p> <p>The Staff Report analyzes five proposed amendments to the current OTC Policy. Alternative 1 proposes no extension of any of the compliance deadlines. The remaining proposals (Alternatives 2 through 5) would each extend the compliance deadlines for all four of the OTC power plants by at least one year. As requested by Board Member Sean Maguire at the April 21, 2020 workshop, the Water Board should consider a sixth alternative that would extend the compliance deadlines for the Alamitos, Huntington Beach, and Ormond Beach plants, but not for AES Redondo Beach. As shown in the following chart, the projected need of 2,750 MW of OTC</p>	<p>calculations included in this comment appear to assume that all procurement ordered by August 1, 2021 will be online on time. However, uncertainties stated in Section 5.1 of the Staff Report reinforce the need for OTC compliance date extensions.</p>

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	<p>generated power (the upper end of the potential capacity shortfall) can be obtained without AES Redondo Beach.</p> <p>The Staff Report recommends Alternative 5, which would extend the compliance deadline for AES Redondo Beach by one year and the remaining three plants by three years each. The Staff Report contends its recommendation “balances the need for grid reliability with marine life, land use and air quality concerns.” (Staff Report, p. 18.) As noted in detail above, however, AES Redondo Beach has a greater negative effect on marine life, land use, and air quality than any of the other facilities, and extending this plant for even one year is not needed to maintain grid reliability.</p>	
014.21	<p>Over the next four months and without explanation, the idea of extending “one or more additional OTC resources” for “no longer than necessary” was abandoned. In its January report, SACCWIS recommended that the Water Board extend the OTC Policy compliance deadlines for each of the four OTC plants for at least one year.</p>	<p>Please see Master Response 2.2. Furthermore, the SACCWIS did not include language limiting the compliance date extensions for no longer than necessary in the January SACCWIS Report because the SACCWIS was able to provide a specific recommendation of how long to extend compliance dates for each of the four OTC facilities to ensure grid reliability. The August 2019 SACCWIS Report noted that SACCWIS intended to provide a concrete recommendation on further compliance date extensions</p>

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		<p>for OTC facilities to the State Water Board in late 2019. This Report proposed potential compliance date extensions, and, importantly, recognized that the SACCWIS would have to reconvene to allow the member agencies of the SACCWIS time to gather additional information that could affect proposed compliance date extensions. After the CPUC adopted D. 19-011-016 in late 2019, the SACCWIS convened in January 2020, and adopted the January 2020 SACCWIS Report based on the additional information provided by CPUC and CAISO. Furthermore, in the May 2020 Joint Energy Agency Letter, the CPUC, CEC, and CAISO unanimously supported the SACCWIS' recommendation in the January 2020 SACCWIS Report.</p>
014.22	<p>The SACCWIS recommendation is based in part on the recommendation of the CPUC. Notably, however, the CPUC never made a finding regarding the amount of projected shortfall, nor did it ever state that an extension of the OTC Policy compliance deadline for all four OTC plants was necessary to maintain grid reliability. To the contrary, the CPUC stated "it is impossible to predict the size and length of a bridge we may need retiring OTC units to provide." (D.19-011-016, p. 19.) The CPUC also recognized that the compliance deadlines for all four of the OTC facilities may not be extended. (D.19-011-016, p.</p>	<p>Please see Master Response 2.2 and response to comment 014.21. To clarify, the CPUC stated in D.19-011-016 that commission staff analysis of the supply stack of current system RA resources available to serve load in 2021 suggests that supplies are tight and that reliance on imports will be increased beyond historical levels, creating uncertainty in system capacity supply. The decision also states that there is a significant possibility of a system resource adequacy shortfall in California by summer of 2021 without the procurement of additional electric resources to address system reliability. As a result, the CPUC recommended in D.19-011-016 that the State Water Board extend the OTC compliance</p>

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	<p>33 [recognizing “the potential for some OTC retirement date extensions not to be granted by the Water Board”]; pp. 67-68 [“The Commission ... trusts that the Water Board will take this [safety issues at AES Redondo Beach] into consideration when deciding whether to extend the OTC compliance deadline”].) The City asks the Water Board to revert back to the original August 2019 recommendation by SACCWIS and extend the OTC Policy compliance deadline only for those facilities necessary to maintain grid reliability, of which AES Redondo Beach is not one.</p>	<p>deadlines for the following units slated to retire by December 31, 2020, for the time periods specified: Alamos Units 3-5 for up to three years; Huntington Beach Unit 2 for up to three years; Redondo Beach Units 5, 6, and 8 for up to two years; and Ormond Beach Units 1 and 2 for up to one year.</p> <p>The CPUC acknowledges in D.19-011-016 that approximately 3,750 MW of capacity from OTC units is currently scheduled to retire by December 31, 2020, and could be available for a compliance date extension to serve as a bridge to allow new resources to come online. Importantly, the decision finds that the need for system RA and renewable integration resources begins in 2021 and will extend through at least 2023 as more renewable resources are added to meet California’s climate goals and as more fossil-fueled and nuclear facilities retire. Thus, the proposed extension of compliance dates for select OTC facilities is recognized by the CPUC as necessary to maintain grid reliability amidst a potential shortfall.</p> <p>Furthermore, the CPUC states in D. 19-011-016 that it is impossible to predict the size and length of a bridge needed that retiring OTC units to provide, and it is prudent to make the OTC units available to the RA program for the next several years to let the energy markets answer these questions. This statement further</p>

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		<p>supports the CPUC’s recommendation of extensions for the compliance dates of some OTC facilities.</p> <p>Additionally, the latter statement regarding the potential for the State Water Board to not grant compliance date extensions is in the context of identifying the amount of procurement of incremental system resources that “should be required at this time [of the decision] in order to support system reliability beginning in 2021.” The CPUC acknowledges that the State Water Board retains the final authority over changes to the OTC Policy; however, the CPUC recommends compliance date extensions to maintain system-wide grid reliability in its decision.</p> <p>The CPUC reaffirmed its recommendation to extend compliance deadlines for select OTC facilities in D.20-03-028. Additionally, in the May 2020 Joint Energy Agency Letter, the energy agencies of the SACCWIS affirmed SACCWIS’ January 2020 recommendation.</p>
014.23	<p>In determining system resource adequacy, the CPUC requires a 15 percent planning reserve margin (PRM). That is, the CPUC requires utilities as a whole to procure 15 percent more dependable electrical generation capacity than the CPUC projects will be needed during peak hours. The PRM is insurance to account for seen and</p>	<p>Please see Master Response 2.1, 2.2, 2.3, 2.4, and 2.5.</p>

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	<p>unforeseen changes and outages. The 4,400 MW shortfall identified in the Staff Report falls within the PRM; i.e., if an additional 4,400 MW of dependable electrical generation capacity is added by 2021, there will be 15 percent more dependable electrical generating capacity available during peak load periods than is required to meet the forecasted peak electric demand. As explained above, assuming the CPUC's very conservative modeling assumptions, the projected shortfall can still be met without extending the compliance deadline for AES Redondo Beach. Therefore, extending the compliance deadline for AES Redondo Beach would only add additional insurance on top of the CPUC's already conservative PRM. This additional insurance is simply not needed and is much too costly in terms of the damage to the environment. The PRM is the insurance with additional insurance already built-in through the conservative modeling input assumptions.</p> <p>The Staff Report identifies a need to extend the OTC Policy compliance dates for 2,750 MW of OTC facility generation. That need can be met without extending the compliance deadline for AES Redondo Beach.</p>	

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014.24	<p>The Staff Report improperly proposes an addendum to the previously approved 2010 Final Substitute Environmental Document (SED) in order to satisfy the Water Board’s environmental review obligations in connection with the OTC policy amendment.</p> <p>There is a question as to whether an addendum to a decade old SED is appropriate under these circumstances. An addendum is usually appropriate if the lead agency determines that some changes or additions are necessary to the SED, but none of the conditions described in CEQA Guidelines Section 15162 have occurred. (CEQA Guidelines § 15164.) (See, e.g. CEQA Guidelines §15162 indicating that an addendum to a previously certified environmental impact report is only appropriate when there are no changes to a project, there are no changes in circumstances in which the project is being undertaken, and no new information of substantial importance, which was not known and could not have been known, shows that there are significant environmental impacts or more effective mitigation measures.) The Staff Report does not address any of the conditions that might require the preparation of a subsequent or supplemental SED. Nor did the Staff Report evaluate a separate alternative of no</p>	<p>Please see Master Response 2.1 and 2.6, which include descriptions of the intent of the OTC Policy, compliance with the OTC Policy, and CEQA requirements. Please also see responses to comments 007.11 and 014.08. Additionally, the 2010 Final SED examined the potential environmental impacts of adopting the OTC Policy. The usage of OTC facilities has generally declined since the OTC Policy’s adoption and impacts are expected to remain at or below previously identified baseline levels which were compared for analysis to potential impacts of compliance with the OTC Policy. Further, extending the compliance dates of select OTC facilities is within the originally analyzed project and not expected to otherwise create new environmental impacts.</p> <p>California Code of Regulations, title 14, section 15162 (regulations referred to as CEQA Guidelines) provides that: “When an EIR has been certified . . . no subsequent EIR shall be prepared for [a] project unless the lead agency determines, on the basis of substantial evidence in light of the whole record [that] . . . substantial changes are proposed in the project which will require major revisions due to the involvement of new significant environmental effects or an increase in the severity of previously identified significant effects.” Other triggers for such a subsequent EIR include: substantial changes to the circumstances under which the project is undertaken, requiring major revisions of the</p>

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	extension for AES Redondo Beach.	<p>previous EIR due to new significant effects or an increase in the severity of previously identified significant effects; or new information not known at the time of the previous EIR which will result in new significant effects or an increase in the severity of previously identified effects. Effects associated with continued operation of affected power plants are not impacts resulting from OTC Policy adoption or reasonably foreseeable methods of compliance. Rather, these impacts were part of the environmental baseline.</p> <p>Adequate alternatives to address the identified grid reliability concerns are provided in Section 5 of the Staff Report. Additionally, the option of not extending the compliance date for Redondo Beach was considered, although not as a formal alternative. The reason why an extension for Redondo Beach is a viable option can be found in Section 5 of the Staff Report and the May 27, 2020 joint letter submitted by the CAISO, the CPUC, and the CEC to the State Water Board.</p>
014.25	For example, the SED states: “State Water Board staff cannot accurately assess air quality impacts related to criteria pollutants because it is difficult to estimate the method of compliance for each facility.” (SED, p. 112.) The Water Board now has more than 10 years’ worth of data to consider since it adopted the SED. New information about	Please see Master Responses 2.1, 2.5, and 2.6. Air quality impacts from the ongoing operation of OTC facilities existing during the adoption of the OTC Policy were considered as part of the baseline in the 2010 Final SED. Impacts resulting from continued operation of the OTC facilities are expected to be at or below these

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	air quality impacts from the OTC facilities, which was not known in 2010, should be evaluated to determine whether it shows different environmental impacts.	levels.
014.26	Furthermore, the Staff Report fails to acknowledge any of the additional impacts caused by extending the AES Redondo Beach facility beyond its originally scheduled compliance date. These impacts received no environmental analysis as part of this proposed extension. The Staff Report simply assumes that there will be no air or water quality impacts. The proposed addendum is therefore not appropriate and further environmental review is needed.	Please see responses to comments 014.08, 014.24 and 014.25. Please also see Master Responses 2.1 and 2.6, which includes a description of the intent of the OTC Policy, compliance with the OTC Policy, and CEQA requirements. Additionally, the Staff Report does not assume there will be no impacts from the proposed extension of compliance dates for OTC facilities. The Staff Report states that extending the operation of the four facilities will extend the existing air, noise, and aesthetic impacts previously identified; however, these impacts are not a result of adoption of the OTC Policy or of reasonably foreseeable methods of compliance with the Policy. Further, such impacts are expected to remain less than the baseline levels established in the 2010 Final SED. Sections 5.5 and 5.6 of the Staff Report were revised to add more information on land use and air quality impacts.
014.27	The Water Board should also consider other changes in conditions since 2010, such as: <ul style="list-style-type: none"> • Two medium density condo products on Catalina Ave just east of the facility 	Comment noted. Please see Master Response 2.1 and 2.6, which includes a description of the intent of the OTC Policy, compliance with the OTC Policy, and CEQA requirements. Please also see Master Response 2.2 and 2.4, as well as Section 5.5 of the Staff Report, which

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	<ul style="list-style-type: none"> • A new hotel in front of the power plant • A new and heavily used bike track on Harbor Drive • A new retail development (Green Street) just east of the power plant • Replacement of industrial and retail buildings with medium density residential on streets perpendicular to the power plant • The discovery of active wetlands and related wildlife on the property, such as the geese shown in the photograph below <p>Prior to moving forward, the Water Board should evaluate a separate alternative of extending the deadlines for the other three plants, without extending the deadline for AES Redondo Beach, as well as evaluate whether an addendum is satisfactory under the circumstances.</p>	includes a discussion of land use impacts.
014.28	The Water Board has an obligation to achieve statewide compliance with Section 316(b) of the Clean Water Act, which requires that OTC structures implement the best technology available for minimizing adverse environmental impacts. If the proposed OTC Policy amendment is adopted, AES Redondo Beach will continue to defer compliance with the best technology	Please see Master Responses 2.1 and 2.2.

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	available standard required by Section 316(b).	
014.29	<p>Those of us who live here, go to school here and have businesses here do not want to endure another year of the visual blight of the 50-acre power plant and power-line corridor, and see all the momentum of the last 18 months of State, County and City efforts to restore the wetlands and remake this blighted brownfield site evaporate. Only retiring this plant on time will eliminate the negative impacts to our community and the marine environment. The Water Board should decline to extend the AES Redondo Beach compliance deadline, consistent with its mandate to protect water quality under federal and state law. The Water Board can accomplish this objective by omitting the one-year extension for AES Redondo Beach under the proposed amendment to the OTC Policy. The remaining extensions are sufficient to ensure statewide electrical grid reliability next year.</p> <p>AES Redondo Beach should not be used as a safety net or insurance policy at the expense of the environment and surrounding community. It should retire on time at the end of 2020 as planned for over a decade. The City urges the Water Board to adopt an alternative that does not</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5. Please also see Sections 5.1, 5.3, 5.5, and 5.6 of the Staff Report and responses to comments 007.11, 014.06, and 014.24.</p>

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	<p>extend the compliance deadline for AES Redondo Beach and also consider whether the wetlands (Old Salt Lake) also falls within the permitting and enforcement jurisdiction of the Regional Board.</p> <p>In closing, the City wishes to thank the Chair, the Board Members and Staff for their continuing hard work on the OTC Policy Amendment and appreciates consideration of the City's concerns. Although the recommendation of a one-year extension for AES Redondo Beach is intended to address the City's concerns, it does not go far enough for a community that has been living with the plant's impacts for decades and eagerly awaiting the power plant's retirement at the end of this year.</p>	
015.01	<p>However, I oppose even a one-year extension for three important reasons:</p> <ol style="list-style-type: none"> 1. The power capacity is not needed for local or system reliability. 	Please see Master Response 2.2.
015.02	<ol style="list-style-type: none"> 2. The continued health impacts both to our residents and marine life are significant. This is a particularly important consideration NOW, as experts have advised that those exposed to impaired air 	Comment noted. Please see Master Responses 2.1, 2.3, 2.4, and 2.5.

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	<p>quality are more likely to be susceptible to the dire effects of COVID-19.</p>	
015.03	<p>3. There are already plans in place to convert much of this site and the Southern California Edison power corridor for public use. Continued operation beyond December 31, 2020 will jeopardize already awarded funding and financing for this important restoration for wildlife habitat and public use. With so much economic uncertainty due to COVID-19, this consideration is of heightened importance.</p> <p>I urge you to adhere to the original plan to cease operation of the AES power plant by December 31, 2020.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.4. Prior agreements between Southern California Edison and associated parties regarding land use are generally outside the scope of the Amendment.</p>
016.01	<p>I am writing to oppose the recent recommendations by the Public Utility Commission (PUC) and the State Advisory Committee on Cooling Water Intake Structures to extend the Once Through Cooling (OTC) Policy's compliance deadline for the AES Redondo Beach power generating facility.</p>	<p>Comment noted.</p>
016.02	<p>The OTC Policy implemented in 2010 was established to combat the severe environmental</p>	<p>Comment noted. Please see Master Responses 2.3 and 2.4. Please also see Section 5.5 of the Staff Report for a</p>

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	<p>impacts of the once through cooling systems, which kills millions of marine life and discharge warm water back to the ocean contributing to the ecosystem deterioration. In addition, the plant site includes six acres of historical wetlands known as the Old Redondo Salt Lake and due to the nature of the site, standing water is an ongoing safety hazard. This hazard directly contradicts with the California Coastal Commission requirements to preserve those wetlands.</p>	<p>discussion of land use impacts and responses to comments 001.38, 003.02, and 014.04.</p>
016.03	<p>Furthermore, as a neighbor to Redondo Beach, this power plant will have a tremendous impact to the quality of life to many children and their families. The environmental impact of air pollution and radiating power transmission sees no boundaries and will have long term effect to its surrounding communities.</p> <p>Currently, the facility is scheduled to close and the end of 2020. Extending the OTC compliance deadlines for the AES Redondo Beach plant is unwarranted and harmful to many surrounding communities. I urge the Board to omit the AES Redondo Beach Generating Station from the proposed extension of the OTC Policy deadline.</p>	<p>Comment noted. Please see Master Responses 2.1 for a description of the intent of the OTC Policy and compliance with the OTC Policy, Master Response 2.2, and Master Response 2.5. Please also see response to comment 003.01 and 014.08.</p>

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017.01	<p>I am opposed to the proposed extension of the Once Through Cooling (OTC) Policy’s compliance deadline for the AES Redondo Beach power generating facility.</p> <p>As a resident and current councilmember in the neighboring City of Hermosa Beach, I have expressed my opposing to the continued operation of the AES power plant for close to a decade. The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant. In addition, various NGOs, including Heal the Bay and Surfrider Foundation, are opposed to any extension of operations at AES.</p>	Comment noted.
017.02	<p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa Beach’s southern border. Hermosa Beach is one of the most densely populated beach cities in California. AES is across the street from many Hermosa Beach homes, and many of the residents are senior citizens. <u>According to the Profile of the City of Hermosa Beach prepared by the Southern California</u></p>	Comment noted. Please see Master Responses 2.1 and 2.5.

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	<p><u>Association of Governments (SCAG) Regional Council, dated May 2019, approximately 11.4 % of the residents of Hermosa Beach are over the age of 65.</u> Any extension of the AES power plant operations will have a significant negative impact on the health and quality of life of Hermosa Beach residents.</p>	
017.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. <u>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</u></p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5. Please also see response to comment 014.08.</p>
018.01	<p>I am writing to inform the Water Board that East Bay Community Energy Authority has entered into an agreement with AES Redondo Beach, LLC for the purchase of resource adequacy capacity from the Redondo Beach Generating Station to support East Bay Community Energy Authority’s resource adequacy requirements. Without an OTC</p>	<p>Comment noted. Please see Master Response 2.2 and response to comment 001.08.</p>

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	extension for this resource, resource adequacy supply will decrease in California which may adversely impact electricity rates for our customers.	
019.01	GenOn supports the OTC Policy Amendments. California’s energy agencies have identified a need for OTC Policy compliance deadline extensions to protect grid reliability in times of peak energy demand over the next few years. To resolve the anticipated shortfall in generating capacity, the Board proposes to adopt the alternative recommended by the Statewide Advisory Committee on Cooling Water Intake Structures (“SACCWIS”), which includes a three-year OTC Policy compliance deadline extension for GenOn’s Ormond Beach Generating Station (“Ormond Beach Station”). GenOn believes that a three-year extension for its facility will maximize reliability safeguards and at the same time minimize community and environmental impacts.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.
019.02	<p>The following comments are provided as additional support for the Board’s proposed course of action:</p> <p>I. GenOn suggests that the Board clarify that all SACCWIS energy agencies, including</p>	Comment noted. Section 5.1 of the Staff Report was revised to provide this clarification.

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	<p>the California Public Utilities Commission (“CPUC”), recommend a three-year extension for Ormond Beach Station. Currently the Staff Report for the OTC Policy Amendments, especially page 12, could give the impression that the CPUC still recommends a one-year extension for Ormond Beach Station, which is not the case.</p>	
019.03	<p>II. The Board should reject the suggestion made by some commenters during the April OTC Workshop that these OTC Policy Amendments should address a hypothetical change in the CPUC’s determination of system need for generation. There is no need for the commenter’s suggested provision. The CPUC and other energy agencies in SACCWIS have identified a reliability need for Ormond Beach Station into 2023. Since then, GenOn has signed a three-year Resource Adequacy (“RA”) agreement for the capacity of Ormond Beach Station, which further demonstrates the reliability need for the facility into 2023.</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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019.04	<p>III. GenOn agrees with Board Staff that a three-year extension for Ormond Beach Station, as proposed, will maximize the benefit to Oxnard-area residents under the Agreement for Demolition and Remediation of the Ormond Beach Station (“Agreement”) between GenOn and the City of Oxnard (“Oxnard”). Assuming CPUC approval of the three-year RA agreement mentioned above, a three-year OTC compliance deadline extension for Ormond Beach Station will set the stage for the fastest and most well-funded demolition and remediation of the site under the Agreement. GenOn is proud of arriving at this solution with Oxnard and committed to its obligations under the Agreement.</p>	Comment noted.
019.05	<p>IV. GenOn also agrees with Board Staff that a three-year extension for Ormond Beach Station will have minimal impacts on marine life due to the plant’s low level of operation and other factors. Current interim mitigation requirements will continue to offset these impacts as required by the OTC Policy during the extension period, just as they have in prior</p>	Comment noted. Please see Master Response 2.3.

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	years.	
019.06	V. Ormond Beach Station operates in compliance with all required environmental permits and has a relatively simple path to Regional Water Board permitting of an OTC compliance deadline extension.	Comment noted. Please see Master Response 2.1.
019.07	<p data-bbox="361 677 1031 816"><u>Board Staff Should Clarify That All SACCWIS Energy Agencies, Including The CPUC, Recommend A Three-Year OTC Extension For Ormond Beach Station.</u></p> <p data-bbox="361 854 1058 1390">All three of California’s energy agencies have determined that OTC generating capacity will continue to be necessary for grid reliability during peak demand hours in the next few years, until new resources are operational. The Ormond Beach Station is an important part of that recommended strategy for ensuring system-wide reliability. As the CPUC recently observed, “the Ormond Beach power plant is among the largest (approximately 1,500 MW) complying with OTC deadlines” and therefore provides “a significant reliability insurance benefit.” The reliability advantage of Ormond Beach Station is one reason why the CPUC revised its recommendation for an OTC extension for the</p>	Comment noted. Sections 5.1 and 5.5 of the Staff Report were revised to include the CPUC’s updated recommendation for Ormond Beach from a one-year extension to a three-year extension in D.20-0-028, which is consistent with SACCWIS’ Alternative 4.

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	<p>facility from one year to three years in D.16-02-007, issued March 26, 2020.</p> <p>Currently the Staff Report for the OTC Policy Amendments mentions only the original CPUC recommendation of a one-year extension for Ormond Beach Station in D. 19-11-016. It does not mention the subsequent CPUC revised recommendation of a three-year extension in D.16-02-007. Clarifying the final recommendation of the CPUC in the Staff Report is important because the OTC Policy affords it significant weight. GenOn recommends the following edits to page 12 of the Staff Report, when discussing SACCWIS Alternative 3, to clarify this point:</p> <p><i>This alternative <u>is</u>was recommended by the CPUC in D.19-11-016 and is intended to minimize the harmful impacts on local communities near Ormond Beach and Redondo Beach expressed by stakeholders. <u>More recently, based on new information, the CPUC issued D.16-02-007 that clarified the CPUC's agreement with SACCWIS Alternative 4 described below.</u></i></p>	
019.08	<p><u>There Is No Need To Speculate About The CPUC's Reliability Determination In These OTC Policy Amendments.</u></p>	<p>Comment noted. Please see Section 5.1 of the Staff Report regarding the rationale and consideration for the compliance date extensions associated with grid</p>

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	<p>In addition to being entitled to significant weight, the CPUC’s role in evaluating the reliability need for OTC extensions means that the Board need not address hypothetical grid conditions in these OTC Policy Amendments. Two commenters during the April OTC Board Workshop requested a provision in the OTC Policy Amendments that would require OTC plant retirements before the end of their extensions under the OTC Policy if the CPUC decides that the plants are no longer “needed” for the entire extension period. GenOn believes this type of provision would lead to ambiguity and unintended consequences in its future application to unknown facts. It is also entirely unnecessary.</p> <p>The CPUC identified a reliability need for OTC generating capacity, including that of Ormond Beach Station, for another three years beyond 2020. GenOn has already signed an RA agreement for the generating capacity of its facility from 2021 to 2023. The RA agreement allows the load-serving entity (“LSE”) that solicited it to rely on the capacity of Ormond Beach Station as part of the LSE’s strategy for meeting reliability requirements into 2023 (assuming Board approval of the proposed extension and CPUC approval of the RA agreement). The fact that an LSE has</p>	<p>reliability and grid conditions, Master Response 2.2, and responses to comments 001.10 and 007.16.</p>

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	<p>already signed a three-year RA agreement for Ormond Beach Station is further evidence of the reliability need for the facility to remain <i>available</i> for all three years beyond 2020, regardless of how much (or little) the facility actually operates during that timeframe.</p>	
019.09	<p><u>The OTC Policy Amendments Will Maximize The Benefits To Oxnard-Area Residents Under GenOn’s Agreement With Oxnard.</u></p> <p>GenOn’s Agreement with Oxnard is the only agreement between an OTC owner/operator and local community representatives with mutually acceptable conditions for OTC compliance deadline extensions. As the Staff Report correctly points out, Oxnard-area residents stand to benefit the most from the Agreement with GenOn if the Board approves the three-year extension for Ormond Beach Station, as proposed.</p> <p>Specifically, a three-year OTC compliance deadline extension for Ormond Beach Station will set the stage for GenOn’s demolition and remediation of the site by the end of 2025, assuming CPUC approval of the 2021-2023 RA agreement mentioned above. A three-year OTC extension will also lead to GenOn contributing up</p>	<p>Comment noted. Please note that local land use or the merits of any specific proposal for post-shutdown remediation and associated land use implications or zoning laws are not appropriate for the State Water Board to approve or otherwise resolve pursuant to its regulatory authority.</p>

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	<p>to \$25 million to the local community trust designated in the Agreement as a dedicated source of funding for demolition and remediation. Further redevelopment of the site after demolition and remediation will proceed according to the post-demolition plan that Oxnard and GenOn are developing.</p> <p>Oxnard has expressed support for a three-year extension for Ormond Beach Station to SACCWIS, to the CPUC, and now to the Board. GenOn is proud of earning Oxnard's support and is committed to fulfilling its obligations under the Agreement.</p>	
019.10	<p><u>The OTC Policy Amendments Will Have Minimal Impacts To Marine Life That Will Be Offset By Continuing The Current Interim Mitigation Requirements.</u></p> <p>As pointed out by Board Staff, if an extension is granted to Ormond Beach Station, the facility is expected to continue operating at or below the capacity factors experienced in recent years, which will inherently minimize the impingement and entrainment impacts stemming from the proposed three-year extension. Ormond Beach Station has the advantage of being relatively</p>	Comment noted. Please see Master Response 2.3.

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	<p>efficient in terms of OTC water use per MW-hour of energy production. Figure 11 in the 2010 Final Substitute Environmental Document demonstrated this on a 2000-2005 average. More recent data supports the same conclusion. Table 1 below shows that Ormond Beach Station was the most efficient of all the OTC plants on a 2017-2018 average of water use per MW-hour of production.</p> <p>Although not mentioned in the Staff Report, the Board should consider that Ormond Beach Station also experienced the lowest annual pounds of impinged marine biomass of any OTC plant during the last several years. On average from October 2015 to September 2018, the Board attributed 74 pounds of impinged biomass per 12-month period to Ormond Beach Station, relative to an average of 236 pounds for Redondo Beach Station, 253 pounds for Alamitos Units 3-6, and almost 1,000 pounds for Huntington Beach Generating Station. GenOn believes that a number of factors contribute to its relatively low marine impact, including low OTC water use and the location of its plant's two intake structures more than 2,000 feet from shoreline.</p>	

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019.11	<p>GenOn agrees with Board Staff that the current interim mitigation requirements under the OTC Policy are sufficient for mitigating the low levels of impingement and entrainment that will occur during the period of the proposed OTC compliance deadline extensions. During the April OTC Workshop, two commenters suggested that the current method of calculating interim mitigation fees does not reflect the environmental cost of OTC impacts. Their suggestion is incorrect.</p> <p>Interim mitigation fees are calculated using a method that was specifically designed by the Board and its Expert Review Panel to reflect the costs of mitigating habitat loss and the economic value of fisheries. Fees go to the California Coastal Conservancy, which works with the California Ocean Protection Council to fund mitigation projects. A three-percent inflation escalator is applied to the fee calculation each year, and an additional fee equal to 20 percent of the total payment accounts for the costs of managing mitigation projects. These requirements comply fully with the mitigation provisions of the OTC Policy, Section 2.C(3)(b), and Board Resolution No. 2015-0057. Consequently the Board should continue the</p>	Comment noted. Please see Master Response 2.3.

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	same interim requirements during the period of the OTC extensions.	
019.12	<p><u>Ormond Beach Station Operates In Compliance With Its Environmental Permits And Has A Relatively Simple Path To Permitting Of An OTC Compliance Deadline Extension.</u></p> <p>Ormond Beach Station complies with all environmental permits required for its operation, and there is no agency investigation or enforcement action against the facility under environmental law that would need to be resolved in connection with an OTC compliance deadline extension. Apart from a few monitoring errors over the years that were self-reported and promptly corrected, there have been no violations of the facility’s NPDES wastewater discharge permit in the last five years. Ormond Beach Station stands out favorably from other OTC plants in this respect. In addition, while the Staff Report correctly observes that air emissions from the OTC plants are “typically within permitted limits” (see p. 18), this observation is somewhat of an understatement for Ormond Beach Station, which has had no exceedances of any permitted air emission limitations in at least five years.</p>	Comment noted. Please see Master Responses 2.3 and 2.5.

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	<p>There is no need to amend or renew GenOn’s Title V air permit in connection with the OTC Policy Amendments because the current Title V permit is already effective during the entire period of the proposed three-year extension and does not contain any restrictions that are inconsistent with continuing to operate GenOn’s facility into 2023. In addition, because Ormond Beach Station operates in compliance with the effluent discharge limitations in its NPDES permit, there is no Time-Scheduled Order for achieving compliance with the facility’s NPDES permit and, therefore, no need to amend any such order in connection with an OTC compliance deadline extension for Ormond Beach Station. All that is required is renewal of the NPDES permit with an extended OTC Policy compliance deadline.</p>	
019.13	<p><u>Conclusion</u></p> <p>For the foregoing reasons, GenOn believes that the proposed three-year extension for Ormond Beach Station is a critical part of balancing the need for electric reliability with environmental and community impacts, as the OTC Policy requires. Ormond Beach Station offers a significant reliability benefit with the least environmental and community impacts of any OTC power plant.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5. Please also see Sections 5.1 and 5.5 of the Staff Report.</p>

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	<p>GenOn respectfully requests that the Board adopt the three-year extension proposed for its facility, while clarifying that the CPUC (along with the other California energy agencies) recommend a three-year OTC extension for Ormond Beach, as discussed in Section I of these comments.</p>	
020.01	<p>We oppose the proposed extension; facilities have had adequate time to come into compliance and an extension will continue to allow negative impacts to coastal and marine resources as well as to public health for the communities surrounding the facilities.</p> <p>OTC operation causes significant, harmful, and ongoing impacts to our valuable marine resources. It has been over a decade since the California Energy Commission first recognized OTC as a contributing factor to the degradation of California’s fisheries, estuaries, bays and coastal waters back in 2005. Public discussions began with the State Water Resources Control Board (State Board) that same year on the development of the OTC Policy, which was later officially adopted in 2010. All four of the facilities with deadline extensions in the Proposed Amendment (Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations) have a</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.</p>

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	deadline listed in the approved 2010 OTC Policy to cease or considerably reduce OTC operations by December 31, 2020, providing a full decade for these facilities to come into compliance with the OTC Policy.	
020.02	Since the OTC Policy was approved, California has also committed to have “renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to end-use customers and 100% of electricity procured to serve all state agencies by December 31, 2045.” As we transition to renewable energy sources in Los Angeles County, and throughout the State of California, we understand the need for grid reliability, particularly during times of peak energy demand. However, we must consider the negative impacts of allowing OTC operations to continue beyond the ten-year grace period originally allowed in the 2010 OTC Policy, and the implications of this extension on both public and environmental health.	Comment noted. Please see Master Response 2.1, 2.2, 2.3, and 2.5.
020.03	Given the more-than-adequate time that facilities have had to come into compliance and the negative impacts of OTC to coastal resources and public health, we strongly oppose any extension to compliance deadlines. We recommend that the	Comment noted. Please see response to comment 007.08. Please also see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.

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	<p>State Board require facilities to come into compliance with the original deadlines approved in the 2010 OTC Policy. At a minimum, these facilities must come into compliance as soon as possible, with additional and extensive mitigation fees required if operation continues beyond those original deadlines. In order to ensure that facilities come into compliance as soon as possible, we offer the following recommendations for the Proposed Amendment.</p>	
020.04	<p>We urge the State Water Board to adjust the language as suggested below, and include this statement not only in the Staff Report, but also in the Proposed Amendment to ensure that facilities come into compliance as soon as possible.</p> <p>“If future IRP processes by the CPUC show that the OTC units are no longer necessary to ensure system-wide grid reliability during the approved extended compliance date periods, owners and operators could elect to <u>must</u> retire the units early.”</p>	Please see response to comment 007.16 and Master Response 2.2.
020.05	<p>The Staff Report states that “[o]f the four power plants, Redondo Beach is the least efficient, requiring more OTC intake water to produce a megawatt-hour than the other power plants, and</p>	Comment noted. Please see Master Response 2.2 and 2.3.

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	resulting in potential impacts to marine life” including a greater threat of impingement, entrainment, and impacts due to the discharge of OTC wastewater.	
020.06	Additionally, this facility is primarily used during periods when demand for power is high, such as on hot summer days, when local residents and international visitors are most likely to be recreating outdoors and thus more susceptible to the environmental impacts of facility operation, such as poor air quality. Considering the increased impacts of OTC operation at this inefficient facility, we urge the State Board to require closure of the Redondo Beach facility by the original 12/31/2020 deadline.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5. Please also see response to comment 014.08.
020.07	Interim mitigation should be a way to curtail the ongoing damage to our coastal resources while a power plant comes into compliance. However, when mitigation costs per gallon were determined in 2015, the State Board indicated that the mitigation was not intended to fully mitigate ongoing OTC impacts, but rather to encourage power plants to meet compliance deadlines. It is clear that this approach has been unsuccessful, as many extension requests have been submitted since the OTC Policy was approved, even with the	Comment noted. Please see Master Response 2.3 and response to comment 007.08. Furthermore, the assertion that implementation of the interim mitigation requirements has been unsuccessful is unsubstantiated.

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	<p>existing mitigation fees.</p> <p>We therefore recommend that the Board consider increasing mitigation fees to better mitigate the continued degradation of California’s coast and marine life. At a minimum, the mitigation for the extended use of these plants should be twice as much as the existing interim mitigation calculation, particularly for the inefficient Redondo Beach facility. Alternatively, the Board could include a flat \$10,000,000 mitigation fee for operations to continue beyond the original compliance deadlines, <i>in addition to</i> the existing mitigation cost per gallon of OTC water. An additional escalating mitigation fee must be applied again if operation continues beyond any extended deadline awarded with this Tentative Amendment.</p>	
021.01	<p>In 2010, the California State Water Resources Control Board ordered all four gas-fired power plants along the coast that use ocean water cooling to stop the practice by December 31, 2020. This was a welcome development for our communities as ocean water cooling is dangerous to marine life.</p>	<p>Comment noted. Please see Master Response 2.1, which includes description of the intent of the OTC Policy and compliance with the OTC Policy. Please also see Master Response 2.3.</p>
021.02	<p>We urge you to protect marine life along our California coast by not extending the ocean water</p>	<p>Comment noted. Please see Master Responses 2.2 and</p>

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	cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago. The Alamitos (Long Beach) and Huntington Beach facilities have been largely modernized so remaining seawater-cooled capacity is significantly reduced already. At Alamitos, three of six units have already been taken offline. At Huntington Beach, three of four have been decommissioned. The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018 and is scheduled to be decommissioned.	2.3.
021.03	With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants based on arguments of "grid reliability" will be reduced even further.	Comment noted. Please see Master Response 2.2.
021.04	Besides the damage to marine life, these plants damage public health and contribute to climate change. Indivisible South Bay LA is committed to supporting a just transition away from fossil fuels. That can be furthered by replacing these polluting power plants with power from renewable sources.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5. Please also see response to comment 007.02.
022.01	On behalf of the over 21,000 members of	Comment noted. The Amendment includes a revision of

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	<p>International Brotherhood of Electrical Workers Local Union 1245 working in California, I write to urge you to adopt Staff recommendations to amend the Once Through Cooling (OTC) to revise the compliance dates for Nuclear Power Plant (DCPP) Units 1 and 2 by reducing Unit 1 by two months to November 2, 2024 and extending Unit 2 by eight months to August 26, 2025.</p>	<p>the compliance dates for Diablo Canyon Nuclear Power Plant Units 1 and 2, to match their respective Nuclear Regulatory Commission license expiration dates of November 2, 2024, for Unit 1 (two-month reduction) and August 26, 2025, for Unit 2 (eight-month extension). This amendment is intended to address a previously-known discrepancy while implementing the terms of an agreement approved by the CPUC to retire Diablo Canyon</p>
022.02	<p>Our members are charged with operating DPCC Units One and Two until the NRC operating licenses expire in November 2024 and August 2025, respectively. DCPP workers are committed to keep plant operations safe and reliable to the end. Our members need these compliance changes so they may continue to do this important work. They have accepted the challenge to close the plant and then begin critical work to safely decommission each unit.</p> <p>We ask for your vote to amend the OTC policy at DCPP in order to align these dates with the NRC license periods as a final step to ensure effective implementation of the plan to retire DCPP and allow our members to conclude their work careers as they have planned.</p>	<p>Comment noted.</p>

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023.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Comment noted. Please see Master Response 2.2.
023.02	AES Redondo s a gas-fired, 1950s-technology powr generatin station, the least efficient and most poluting per kilowatt of any coastal plant still runing.	Comment noted. Please see Master Responses 2.2, 2.3, and 2.5.
023.03	AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted.
023.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, but h the City of Redondo Beach had a deal with the owner of the plant to purchase helf of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Comment noted. Please see Master Response 2.1 and 2.4.
023.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is	Comment noted. Please see Master Response 2.2.

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	necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	
023.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted.
024.01	I am writing on behalf of over 100,000 skilled and trained men and women of the LA/OC Building Trades to express our support for a three year extension of operations at the Redondo Beach powerplant facility.	Comment noted.
024.02	The continued operation of the Redondo Beach power plant for three years is critical to ensuring the safe and reliable delivery of electricity to serve Southern California in these uncertain times. If the Board shuts the project in 2020, the facility will no longer be available and, significantly, its highly skilled, trained workforce will no longer be available to keep our electric grid stable and	Comment noted. Please see Master Response 2.2.

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	reliable in times of need.	
024.03	If the powerplants are kept ready to serve and they are not needed, they will not run and will thus have no impacts on air quality or the environment. If, however, they are needed, Redondo Beach and the other OTC units will keep the lights on in 2020 and over the next few years while we hope to see new California-based energy resources come on line.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
024.04	It is important to have insurance against blackouts and rolling brownouts. These power plants provide the emergency back-up and a least regrets insurance policy during uncertain times. We do not know, for example, if new renewable projects will be delayed due to physical and economic disruptions associated with the COVID-19 pandemic. In addition to COVID-19, we also face the possibility for future dry years which could reduce hydroelectric energy output in California and the Pacific Northwest.	Comment noted. Please see Master Response 2.2.
024.05	While we hope to not see repeats of the last few fire seasons, we believe that it is prudent to assume more wildfires may occur in 2020 and beyond. In addition to the known and horrific human impacts on lives and livelihoods, the	Comment noted. Please see Master Response 2.2.

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	<p>devastation associated with wildfires can wreak havoc on our electrical grid. The particulate matter and smoke from a single wildfire can take a major transmission line into the LA Basin out of service. Without the ability to use transmission to import power into the LA Basin during a wildfire event, the calamity associated with wildfires and Public Safety Power Shutdowns (“PSPS”) threaten to literally keep Los Angeles in the dark. A three year extension for Redondo Beach is an important insurance policy against natural disasters</p>	
024.06	<p>We also know that neighboring Western States are needing more and more energy every year, which may mean that California cannot rely on out of state power that it has imported in the past. We believe that keeping Redondo Beach open for three years helps California control its energy destiny.</p>	<p>Comment noted. Please see Master Response 2.2.</p>
024.07	<p>In addition to the human costs of not having adequate insurance against uncontrollable forces that threaten electric grid reliability, there are very real economic impacts that the Board must consider in this rulemaking proceeding. If there are not enough OTC plants available in the market and supply is restricted, energy prices will</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	go up for consumers and businesses, putting California at an economic disadvantage. These risks comes at a time when unemployment is reaching unprecedented highs and many businesses, including public and private utilities, are already experiencing financial hardship from COVID-19.	
024.08	It makes sense to our membership that we exercise caution in these uncertain times. A three year extension of the Redondo Beach powerplant through 2023 will have no significant environmental impacts, will prevent potentially devastating impacts associated with blackouts and PSPS events, and provides an important insurance policy against further economic dislocations and impacts.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
025.01	I am writing to inform the Water Board that Monterey Bay Community Power has entered into an agreement with AES Redondo Beach, LLC for the purchase of resource adequacy capacity from the Redondo Beach Generating Station to support Monterey Bay Community Power’s resource adequacy requirements. Without an OTC extension for this resource, resource adequacy supply will decrease in California which may adversely impact electricity rates for our	Comment noted. Please see Master Response 2.2.

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	customers.	
026.01	The proposed OTC amendment includes a revision to align DCP's OTC compliance date with its Nuclear Regulatory Commission license expiration dates. The OTC policy currently includes a compliance date of December 31, 2024, for both units. The proposed revision includes unique dates for each of DCP's two units: November 2, 2024, for Unit 1 and August 26, 2025, for Unit 2. As outlined below, PG&E supports adoption of this proposed revision as it reflects the original intention of the Board staff in assigning OTC compliance dates and is an important component of effective implementation of the California Public Utility Commission (CPUC)-approved DCP retirement plan.	Comment noted.
026.02	First, it is important to note that during the OTC Policy adoption process, PG&E raised the issue of a disconnect between the proposed compliance deadline for DCP in various drafts of the OTC Policy and the plant's NRC operating licenses. In fact, the September 16, 2009 draft of the Policy included a date of December 31, 2021, as DCP compliance deadline. In presenting the final (original) policy at the May 4, 2010 adoption hearing, staff reported (at transcript page 23),	Comment noted.

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	<p>“[T]he Diablo Canyon final compliance date was extended to 2024; that was to line up with the relicensing period.” PG&E stated to staff that their intent was not in fact realized due to the August 26, 2025 license expiration date for Unit 2 and was told it could be picked up in subsequent amendments given how far off the date was at that time.</p>	
026.03	<p>Initially, focus was on completing the technology assessment required under the Nuclear Review Committee process and required for the subsequent determination of an alternative compliance approach provided for under the OTC Policy that would need to be made well in advance of the existing December 2024 compliance date. Once the decision to not renew the DCPN NRC licenses was approved and an alternative compliance determination regarding the plant was no longer necessary, revising the compliance dates to align with each unit’s NRC license expiration was reprioritized. Including the DCPN date realignment in the current OTC amendment proposal provides the certainty needed to ensure effective implementation of the DCPN retirement plan.</p>	Comment noted.

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026.04	<p>As part of the Joint Proposal to Retire Diablo Canyon Nuclear Power Plant at Expiration of the Current Operating Licenses, PG&E and six other parties including Friends of the Earth, the Natural Resources Defense Council and the International Brotherhood of Electrical Workers Local 1245 agreed that “PG&E will ask the State Water Board for an amendment to the OTC policy to conform the compliance timeline table to the date of actual expiration of the Unit 1 and Unit 2 NRC operating licenses.” The Joint Proposal was subsequently approved by the CPUC and a decision issued on January, 16, 2018, to approve the retirement of Diablo Canyon (CPUC D.18-01-022). The Joint Proposal both agrees to the retirement of Units 1 and 2 at the end of the current NRC licenses and acknowledges that the units may operate until each license expires, recognizing the value and investments of those licenses for our customers.</p>	Comment noted.
026.05	<p>DCPP’s more than 2200 megawatts of GHG-and criteria pollutant-free generation are a significant benefit to the state’s ongoing effort to combat global climate change and protect local air quality. The Joint Proposal and further work with and by the CPUC, California State Lands Commission, the California State Legislature, and the Governor’s office, reflect a complex process to</p>	Comment noted.

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	<p>establish a clear and effective plan to retire Diablo Canyon, while ensuring an orderly, carbon-free transition away from once-through cooling technology. The State Water Board’s action to align the compliance dates with the NRC license periods is a final step in ensuring effective implementation of the plan to retire DCP.</p>	
026.06	<p>Under the OTC Policy, PG&E is required to pay an interim mitigation fee based on flow volume. Despite DCP’s disproportionately low level of impingement and entrainment impact, PG&E has paid over \$16.4 million in interim mitigation fees for the period October 2015 –September 2019 and will continue to pay annual fees of approximately \$4.0 million through 2024. Adoption of the proposed realignment of the compliance dates means that DCP’s Unit 2 will be allowed to operate through August 2025 and additional payments to the State Water Board’s mitigation fund could be in the range of \$1.5 million. These additional fees, paid to the State Coastal Conservancy, would directly benefit the coastal marine and estuarine habitat in the vicinity of DCP.</p> <p>Therefore, PG&E supports the proposed date realignment as a key step in ensuring effective</p>	<p>Comment noted. Please see Master Response 2.3.</p>

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	implementation of the DCPD retirement plan. If you have any questions, my contact information is below. Again, we appreciate the opportunity to provide additional information in support of the proposed compliance date revision.	
027.01	I believe the AES plant should shut down as soon as possible and I don't believe extending it's life makes sense. This power plant is a polluting monstrosity sitting in the middle of a densely populated area. It heats the ocean directly, is inefficient and it is just not necessary for maintaining power-grid reliability.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5. Discharges of the OTC facilities included in the proposed OTC Policy amendment are permitted by NPDES permits, which serve to implement CWA section 316(b) according to CWA Section 402.
027.02	Please do not extend this power plant's life. Its time has come for it to be dismantled and the land put to better public use.	Comment noted. Please see Master Responses 2.1 and 2.2.
028.01	Our group, along with the overwhelming majority of Redondo Beach residents vehemently opposes keeping the AES plant in operation beyond December 2020.	Comment noted.
028.02	The power it generates isn't needed according to industry studies.	Comment noted. Please see Master Response 2.2.
028.03	Any power AES-Redondo generates can't be used for emergency purposes as it is so	Comment noted. Please see Master Response 2.2.

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	antiquated it takes 24 to 36 hours to start up.	
028.04	Public health and safety hazards from the 1950's era technology at the plant emit hundreds of tons of poisonous gas and particulates into our air every year.	Comment noted. Please see Master Responses 2.1 and 2.5. Please also see Section 5.6 of the Staff Report.
028.05	Surrounding the plant are high density residential housing, six schools, multiple healthcare and senior facilities, parks, bike paths and gyms.	Comment noted.
028.06	All are in the direction prevailing winds as the land slopes steeply upward to the same height as the smokestacks.	Comment noted. Please see Master Response 2.5.
028.07	There is an active wetland on the site and AES has a cease and desist order from the Coastal Commission that prevents them from pumping water from the wetland. AES submitted a letter to the Commission stating it cannot run safely without doing this so by AES' own admission it can't safely run.	Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report, which includes a discussion of land use impacts.
028.08	<p>Keeping this plant open longer only benefits the plant owner at the risk of harming the nearly 21,000 people who live in the immediate area.</p> <p>Please do not allow this power plant to operate past December 2020 as was decided a decade</p>	Comment noted. Please see Master Responses 2.1,2.2, and 2.5.

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	ago.	
029.01	The Sierra Club urges the State Water Resources Control Board to deny the extension for the Redondo Beach AES Power Plan to continue to use once-through cooling, using seawater, past the December 31, 2020 deadline.	Comment noted.
029.02	As you know, once-through cooling mangles and cooks marine life to cool the power plant, and it is past time for it to end. As well as its impact on marine life, this power plant, built in the 1950s, produces significant amounts of air pollution and contributes to global warming.	Comment noted. Please see Master Responses 2.2, 2.3, and 2.5. Please also see responses to comments 007.02 and 027.01.
029.03	The air pollution from this old powerplant spews into the most densely populated region of the South Bay, with over 21,000 people per square mile living in Hermosa Beach, and 11,000 people per square mile living in Redondo Beach. This plant also pollutes the air of neighboring cities of Manhattan Beach, Torrance, Gardena, Hawthorne, Compton, and the Palos Verdes Peninsula, and ultimately the rest of Los Angeles Air Basin.	Comment noted. Please see Master Responses 2.1 and 2.5.
029.04	It has been determined that AES site contains a rare wetland and it has been designated as a	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4 and Section 5.5 of the Staff Report for a

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	historic site (no 373) by the State Lands Commission. Shutting down the plan and restoring the area to a natural condition would be a rare opportunity to restore coastal wetlands. It would turn a highly polluting area into a carbon sink, because wetlands are effective at capturing and storing carbon.	discussion of land use impacts.
029.05	Retiring the AES plan and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway.	Comment noted. Please see Master Responses 2.2, 2.3 and 2.4.
030.01	I am writing to inform the Water Board that Silicon Valley Clean Energy has entered into an agreement with AES Redondo Beach, LLC for the purchase of resource adequacy capacity from the Redondo Beach Generating Station to support Silicon Valley Clean Energy's resource adequacy requirements.	Comment noted.
030.02	Without an OTC extension for this resource, resource adequacy supply will decrease in California which may adversely impact electricity rates for our customers.	Comment noted. Please see Master Response 2.2.
031.01	350SBLA submits this organizational comment	Comment noted. Please see Master Responses 2.1,

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	<p>letter concerning the proposal to extend the deadline to phase out for seawater cooling for gas-fired power plants in Southern California</p> <p>In 2010, the California State Water Resources Control Board ordered all four gas-fired power plants along the coast that use ocean water cooling to stop the practice by December 31, 2020. This was a welcome development for our communities as ocean water cooling is dangerous to marine life.</p> <p>Last year, the California Public Utilities Commission requested an extension for an additional three years, which is being considered by the State Water Board for three of the plants (in Huntington Beach, Long Beach, and Oxnard) and a one-year extension for the Redondo Beach plant.</p> <p>We urge you to protect marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago.</p>	2.2, and 2.3.
031.02	The Alamitos (Long Beach) and Huntington Beach facilities have been largely modernized so remaining seawater-cooled capacity is	Comment noted. Please see Master Response 2.2.

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	<p>significantly reduced already. At Alamitos, three of six units have already been taken offline. At Huntington Beach, three of four have been decommissioned. The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018 and is scheduled to be decommissioned.</p> <p>With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants based on arguments of “grid reliability” will be reduced even further.</p>	
031.03	<p>Besides the damage to marine life, these plants damage public health and contribute to climate change. 350SBLA is committed to supporting a just transition away from fossil fuels. That can be furthered by replacing these polluting power plants with power from renewable sources.</p>	<p>Comment noted. Please see Master Response 2.5.</p>
032.01	<p>AES Redondo Beach is not necessary to ensure grid reliability</p> <ul style="list-style-type: none"> • If you choose to extend the other 3 plants - there will be more than enough excess capacity in the first year for grid reliability. Using the CPUC's conservative 	<p>Please see Master Response 2.1, 2.2, 2.3, 2.4, and 2.5.</p>

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	<p>assumptions of a shortfall between 650 and 2,750MW, one can easily see that removing AES-RB from the equation results in NO projected shortfall and actually has a surplus of 144MW available.</p> <ul style="list-style-type: none"> • CAISO and the CPUC are not taking into consideration the procurement of battery storage and new green generation that Clean Power Alliance (CPA) is currently working to both procure and create. On April 2nd, I made a motion to approve the the building of CPA's 100MW Luna Battery Energy Storage project. This is the largest Energy Storage Agreement deal for a CCA in California AND one of the largest in the entire state. Last week, on May 7th, I again made a motion to approve an additional three projects (solar, hydro and storage) totaling 120.1MW of energy and 150MW of storage. These are just the first handful that CPA is working towards in the coming months. • These CPA projects went from bid to contract execution is less than 6-months and demonstrate the nimbleness of meeting fast-changing regulatory 	

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	<p>requirements and electrical grid dynamics.</p> <ul style="list-style-type: none"> • The Water Board should not allow an additional year of environmental damage just to use AES-RB as a safety net, especially considering there is no projected shortfall and CPA's ability to bring more environmentally sound generation and storage online ensuring grid reliability. 	
032.02	<p>Staff's projected "Frequency of Power Plant Operation" supports NOT extending the compliance deadline for AES-RB</p> <ul style="list-style-type: none"> • The previous Water Board Staff Report says that since 2016, all four OTC plants have been primarily used as peakers and operated on average over the last three years at 4.8% capacity. • Any extension would see operations expected to run at or below their current operating capacity. • With that expectation, removing the comparatively small AES-RB should not have an adverse effect on grid reliability. The closure of AES-RB (848MW) can 	<p>Section 5.2 of the Staff Report (Frequency of Power Plant Operation) was revised to clarify how “peaker plants” are used in maintaining grid reliability. Additionally, please see Master Response 2.2.</p>

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	easily be covered by the unused 95+o/o capacity of the larger plants (Alamitos 1,163 MW; Ormond 1,516 MW).	
032.03	<p>AES-RB is the least efficient and most environmentally damaging of the plants being considered</p> <ul style="list-style-type: none"> • AES RB was built in 1954 - one of the oldest gas-fired plants in CA. • According to the chart cited by staff, AES-RB is one of, if not, the least efficient plants in all of California producing more cooling water discharge per unit energy generated than Alamitos, Huntington Beach, and Ormond Beach, combined. This results in potential impacts to marine life. 	Please see Master Response 2.3.
032.04	Staff Report does not address the illegal pumping and degradation of wetlands occurring on the AES-RB site	Please see Section 5.3 of the Staff Report and Master Response 2.4, which include a discussion of impacts to wetlands on the Redondo Beach property.
032.05	Any extension of the AES-RB OTC compliance deadline delays the demolition and remediation of the site and jeopardizes the City's ability to transform a portion of the site into a public park and restore the existing	Please see Master Responses 2.1 and 2.4.

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	wetlands.	
032.06	In conclusion, while I applaud the CPUC for working to proactively ensure a safe and reliable grid for California... their own numbers and assumptions show that AES-RB is unnecessary in accomplishing their goal.	Comment noted. Please see Master Response 2.2.
032.07	Extending AES-RB deadline, for even 1 year, would cause unnecessary environmental, health and safety concerns to city residents and nearby communities by unduly deferring the already mandated closure and remediation.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.
033.01	For the last several years, SBPC, the City of Redondo Beach, the County of Los Angeles, the California Natural Resources Agency, the State Coastal Conservancy, local and state elected officials, and other governmental and non-governmental associations have worked tirelessly to raise funding for the planning and acquisition of a portion of this coastal property with the understanding that the AES Facility would discontinue operations in December 2020; any extension in the operations of the AES Facility would put these efforts at risk. Moreover, operations of the AES Facility would further degrade existing wetlands on the site and would	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.

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	<p>continue to exacerbate the significant and life-threatening risks to public health and safety posed by this inefficient and antiquated power plant. SBPC strongly opposes the recent recommendations from the Public Utilities Commission (PUC) and the State Advisory Committee on Cooling Water Intake Structures to extend the Once Through Cooling (OTC) Policy's compliance deadline of December 30, 2020 for AES Redondo Beach.</p>	
033.02	<p>The AES Plant is located on a triangular-shaped 50-acre parcel located immediately east of the King Harbor Marina and bordered on the north by the City of Hermosa Beach and to the south and east by the City of Redondo Beach. The site has been at least partially developed for industrial uses since the late-1800s and has been the site of a series of power generating facilities. The north east half of the site is the location of what was known as the "Old Salt Lake" or "The Salt Pond", a saline lake or salt pond created by a sequestered salt water aquifer that was used for salt harvesting, first by Native Americans and then in the late 1800s by the Pacific Salt Works company. During this time, Pacific Salt Works was generating 10,000 pounds of salt per day.</p>	<p>Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report.</p>

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	<p>The Old Salt Lake is California State Landmark No.373. Other parts of the site included habitat in the form of a lagoon fringe, alluvial plain, and sand dunes. The entire site is within the City's coastal zone. As power generation facilities expanded, the Old Salt Lake was filled, and the wetlands and coastal native habitats were paved over or otherwise destroyed. However, despite over a century of industrial development and control measures instituted to remove groundwater from plant facilities, historical records, maps and photographs demonstrate that the site has persistently continued to exhibit wetland characteristics including hydric soils, wetland-indicator species and wetland hydrology. In fact, these wetlands are currently occupied by a wide variety of wetland-dependent avian and terrestrial species as observed by SBPC members and our local Palos Verdes/South Bay Audubon Society (See photos in Attachment #1).</p>	
033.03	<p>Per the Redondo Beach Municipal Code, Section 10-2.1110, the only land uses permitted at the AES Plant site are, "Parks, parkettes, open space, recreational facilities, beaches and coastal bluffs." Other land uses such as public buildings or public utilities can only be permitted on a conditional basis – no residential, commercial or mixed-use</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.4. as well as responses to comments 003.02 and 014.07</p>

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	<p>land uses are authorized. Additionally, a citizen-led initiative (Measure DD), which passed in 2008, amended the City Charter to require a public vote for any major changes to the allowable land uses within the City, including the AES site (Redondo Beach Municipal Code Section 10-2.1110). Any entitlements on this property must be approved by the City Council and the residents of Redondo Beach during an election. Additionally, because the AES property is in the coastal zone, any zoning change would also require California Coastal Commission certification.</p> <p>Over the last eighteen years there have been two referendums, an advisory vote and three initiatives, Measures G, A, and B, to modify land uses at the AES site; only one of these actions (Measure B) was led by AES. Between 2002 and 2004, two referendums stopped the City's attempt to rezone the site for high-density mixed-use development. As a result of these two referendums, the City put an advisory vote to the voters in 2005 giving them the choice between a park vision for the AES property or a mixed-use vision for the site. Despite distorted reports generated by the City favoring the mixed-use vision, the residents overwhelmingly voted for the park vision. In 2010, the City put the first</p>	

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	<p>measure, Measure G, on the ballot, which added public parkland as an allowable use of the AES property; this Measure was approved by the voters and the Coastal Commission; AES did not object to the initiative or the added land use. The second measure, Measure A, was an attempt by residents to rezone the power plant site to stop AES's application to build a new power plant on the site. The measure included a requirement for at least 40% of the site to be public parkland and wetlands. AES spent hundreds of thousands of dollars campaigning against the measure and AES threatened to sue the City into bankruptcy and warned residents of power outages if voters approved the measure. Their campaign was successful, and the measure failed by a narrow margin. The third measure, Measure B, was AES' attempt to rezone the site for a large mixed-use development, with no land uses for a power plant and no defined park space. After convincing a slight majority of residents that the power would go out during the Measure A campaign, as part of Measure B, AES was now claiming that power from this facility was no longer needed and that power needs could be met by other supplies including their power plants in Los Alamitos and Huntington Beach. AES spent over a million dollars during the campaign, their opponents</p>	

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	spent \$17,000, and still the measure failed. The history is clear, residents have repeatedly demonstrated that they do not want a power plant, they want a park.	
033.04	According to a document summarizing ex-parte communications between the Water board and AES, AES stated that there were no hurdles to Redondo Beach continuing to operate in the event its once-through cooling (“OTC”) compliance deadline is extended (Attachment #2). AES made a similar statement in their communications to the PUC. SBPC believes that this repeated assertion was disingenuous at best as contractual and regulatory issues were still in negotiation or the subject of litigation when this statement was made.	Comment noted. Prior or ongoing litigation between AES and the CPUC is generally outside the authority and jurisdiction of the State Water Board.
033.05	Since the property was in escrow when AES responded to the PUC’s application, SBPC cannot unerringly attest as to whether there were any contractual concerns at issue but stating that there were “no” issues when the deal was still being negotiated certainly appears suspect. During escrow, the new owner (the property was actually purchased by 12 different LLCs, so “owner” refers to all LLCs and related parties collectively) offered to sell 25 acres of the site,	Comment noted. Please see Master Response 2.1.

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	<p>fully remediated, to the City of Redondo Beach for two million dollars per acre. When the PUC proposed an extension in operations of the AES Plant, this offer was withdrawn (the City was made aware of the withdrawal of the offer via an interview the new owner gave to a local newspaper – Daily Breeze, March 5th, 2020). It is likely that there were negotiations going on between AES and the new owner that would change the terms of escrow to allow for continued operation of the plant and a concomitant distribution of profits between the parties. Attachment #3 is a screen shot of a series of headlines from The Daily Breeze, which gives your Board a quick snapshot of the momentum that was building toward removing the power poles, purchasing parkland at the property, and then the quick reversal upon the announcement of a possible extension of operations at the facility.</p> <p>Ultimately, the mere prospect of extending the operation of this power plant and the significant financial benefits associated there to significantly impacted ongoing and productive negotiations between the new owner and the City of Redondo Beach, which would have led to the rare and historic opportunity to restore coastal wetlands and to develop open space for public use along</p>	

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	the highly impacted and densely populated California coastline.	
033.06	If your Board decides to approve the PUC's and your staff's recommendations, you will be voting against the will and good faith of the residents of the South Bay, their local representatives, the school districts, the health district, the County of Los Angeles (who unanimously voted to develop an Enhanced Infrastructure Financing District for this site), our local assemblyman, congressman and senator, several non-governmental agencies, and multiple regulatory agencies that support the conversion of this site to wetlands and open space.	Comment noted. Please see Master Response 2.1 and 2.2, and response to comment 002.07.
033.07	<p>The AES site was historically a wetland and AES and previous power suppliers needed to pump water from the site to safely operate and maintain the various power plant facilities. AES continues, however, to maintain that these are not wetlands, but the result of the sea water barrier injection program carried out by the West Basin Municipal Water District. Historical photos and records clearly undermine this argument.</p> <p>In 2015, as part of this regulatory process, the CCC surveyed the site and confirmed that there</p>	Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report, which includes a discussion of land use impacts. Please also see responses to comments 001.38, 003.02, 014.04, and 014.07. Furthermore, hydrologic features within California Department of Fish and Wildlife's jurisdiction are regulated by CDFW, which is not a member of the SACCWIS. Therefore, the SACCWIS cannot make recommendations regarding these hydrologic features, and features regulated by CDFW are outside the scope of the State Water Board's authority.

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	<p>were 5.93 acres of jurisdictional wetlands onsite and that any pumping of these wetlands would require a Coastal Development Permit (CDP) and associated mitigation. AES disagreed with this assessment and sued the CCC asserting that there were no jurisdictional wetlands onsite (this litigation has not been resolved). In 2018, the new owner of the AES facility (which was then in escrow) commissioned ESA, an environmental consulting company, to conduct a jurisdictional delineation of the site. ESA confirmed the CCC's assertions that there were wetlands on site and actually expanded the wetland area by identifying 6.55 acres of potential CCC wetlands and 7.01 acres of California Department of Fish and Wildlife jurisdictional stream or lakebed features. (<i>ESA 2018, Redondo Beach AES Facility, Preliminary Jurisdictional Delineation Report</i>) To date, AES has not procured a CDP for the site, nor do they have any approved work-around for operating the plant safely.</p> <p>Through off-site observations, SBPC believes that pumping at the AES Plant ceased in approximately late summer/early fall 2015. As a result, the wetlands, although degraded, quickly and vigorously began to re-establish and associated wetland-indicator plant species began</p>	<p>Additionally, it should be noted that any litigation between AES and the Coastal Commission will proceed separate to the Amendment and is outside the scope of the State Water Board's authority.</p>

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	<p>to flourish. In a short period of time a large variety of shorebirds, migratory birds and other terrestrial species were observed nesting and foraging in and around the site. On a peak day, April 5th , 2020 the local Audubon society identified 346 birds inhabiting or migrating through the site. In all, the Audubon survey of the site includes 92 species of birds (a compendium of observed species, including California Department of Fish and Wildlife Service Species of Special Concern, is included as Attachment #4). As of the final survey report, the observers were able to identify 16 nests and 10 fledglings. It is important to note that surveys were impeded by lack of access to the site and all surveys were made from a rooftop parking lot overlooking the wetland areas of the AES site. Additional species would likely be identified if biologists were allowed full access to the facility.</p>	
033.08	<p>In 2020, not long after the PUC proposed a three-year extension for power operations at the site, SBPC observed that the wetlands were being drained (see before and after photos in Attachment #5). When the CCC was informed of this development, they issued a Cease and Desist order to AES and SBPC's understanding is that a Notice of Violation of the California Coastal Act is</p>	<p>Comment noted. Please see Master Responses 2.2 and 2.4, as well as Section 5.5 of the Staff Report, which includes a discussion of land use impacts.</p>

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	<p>forthcoming. The ability to legally pump the wetlands is critical for the safe operation of the plant. For example, in AES’s application for emergency CDPs to the City of Redondo Beach they stated the following:</p> <p><i>“The Flooded Areas present an imminent and substantial risk to human health and safety, including risks relating to grounds, faults, arc flash, and electrocution, which in turn present substantial and imminent risks associated with electric reliability and operations at the Facility.”</i></p> <p>This is a very serious statement that your Board should take into consideration. In all likelihood, this ongoing regulatory dispute will not be resolved within a short period of time and AES, in their own words, cannot safely operate the power plant without pumping the water from their facilities. These acts alone may make the PUC’s proposed extension of operations of the AES Plant for emergency power unreliable at best and entirely moot at worst. This information was not made available in the Staff Report provided to your Board.</p>	
033.09	Unquestionably, any developer will need to overcome significant zoning and public relations	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>challenges to procure needed entitlements for any development other than open space at this site, but the new owner is not off to a good start in this regard. AES and the new owner of the AES property have initiated a public relations campaign through social media, local newspapers and one-on-one meetings with public officials, unions, and the general public to gain support for a three-year extension in operations of the AES Plant. The attached “talking points” were distributed to AES supporters (some previously on AES’ payroll) via email as part of this campaign so that consistent talking points would be reiterated when testifying in favor of an extension of the plant or when otherwise lobbying for an extension via social media or by writing letters to the local papers. (Attachment #6). The gist of the talking points are that the lights will go out, that the City did not agree to a wonderful park package that was offered during escrow negotiations, that toxic clean-up and environmental restoration and open space will not take place without an extension of operations, and if the extension is not approved, the power plant and the associated power lines will remain in place, abandoned, for several decades to come. This story, which has been widely disseminated to Redondo Beach citizens</p>	

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	and to your Board is misleading.	
033.10	The unexpected and currently unopposed extension of the other three OTC power plants would provide enough energy to prevent rolling blackouts or worse during peak energy use periods in 2021. So, the argument that the lights will go out has no basis in fact. Accordingly, and as stated previously in oral comments before your Board, SBPC recommends that your staff propose an additional Alternative (Alternative #6) for your consideration, to extend all three of the four OTC power plants with no extension of AES Redondo Beach.	Comment noted. Please see Master Response 2.2.
033.11	AES and the new owner did offer the City of Redondo Beach some park amenities if they would step down from their opposition to extending operations at the Plant. What they did not mention is their talking points is that this “park” would not be publicly owned or operated and that parking lots, balconies, lawns and required setbacks would count toward the acreage of the “park”. There were even discussions regarding “moving” the wetlands at the site to suit their development plans, which by the way, have never been shown to the public. It is not surprising that the Redondo Beach City Council, which cannot	Comment noted. Please see Master Responses 2.1 and 2.4.

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	seem to agree on much, voted unanimously to reject their proposal.	
033.12	<p>AES and the new owners are also trying to convince the public that the site will remain a toxic wasteland if they cannot find the “funds” for remediation. A quote from their “talking points” reads as follows:</p> <p><i>“And if the Mayor gets his way, we will be left with a non-operating power plant and power lines sitting idly along our coastline for another decade before anyone finds the funds to remediate and redevelop that site.”</i></p> <p>AES is required by law to fully remediate the site. AES has confirmed this fact publicly on several occasions, but as a scare tactic, they are trying to convince the public that the site will remain a toxic wasteland if your Board does not extend operations of the power plant. Funding the decommission and remediation of the power plant is not something that requires a garage sale or a generous benefactor, it is the sole responsibility of AES Redondo Beach and any entity they transfer this obligation to.</p> <p>Intimating that the power lines will stay in place is another scare tactic. These large and unsightly</p>	<p>Comment noted. Please see Master Response 2.1. Please also see Master Response 2.4 and Section 5.5 of the Staff Report, which includes a discussion of land use impacts.</p>

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	<p>lines run approximately five miles from the power plant to the La Fresa substation just east of the 405 freeway. Removal of the power lines is the responsibility of Southern California Edison (SCE), who have already committed to remove the lines at no cost to the City of Redondo Beach.</p> <p>The City is also working with SCE to purchase and/or lease land along this power corridor to allow for a public trail for inland residents, some in disadvantaged communities, to walk or to ride their bicycles to the beach. SBPC was hoping to restore at least part of this trail with native plant communities and pollinator-specific species to provide native habitat for declining species and to extend habitat connectivity throughout the South Bay. The final and most compelling scare tactic is to warn residents that if they do not receive an extension in operations and the associated profits, the power plant and the electrical lines will remain in place for “another decade”. This assertion defies logic. If the new owner did not have the funds to redevelop the site, then why would he have made an offer and entered into escrow on the property before the PUC proposed any extension in operations of the AES Plant? It is not only non-sensical, but an empty threat as the City still holds the power of eminent domain if the new</p>	

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	owner chooses to purposefully blight the community.	
033.13	SBPC implores your Board to ignore the spin and the testimony of those with financial or political interests that are not in line with the will of a large majority of voters, representatives, and countless other governmental and non-governmental agencies. The funding and the political momentum generated to date to restore this historic site will be significantly impacted by any extension of operations of the AES facility.	Comment noted. Please see Master Responses 2.1 and 2.4.
033.14	<p>The SBPC Board includes members with decades of professional experience with the California Environmental Quality Act (CEQA) and our review of your Staff Report finds your environmental review process in support of the OTC policy amendment alarmingly inadequate.</p> <p>Your Staff Report proposes an addendum to the previously adopted 2010 Final Substitute Environmental Document (SED) to satisfy your CEQA obligations for the proposed extension of four OTC power plants. The purpose of an addendum is to make <i>minor technical changes or additions</i> to an adopted environmental document and can only be used if none of the conditions that</p>	Comment noted. Please see Master Responses 2.1 and 2.6, which include a description of the intent of the OTC Policy, compliance with the OTC Policy, and CEQA requirements. Please also see response to comment 014.24.

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	<p>would trigger a subsequent environmental document have occurred (CEQA Guidelines § 15164). The conditions that would trigger a subsequent environmental document include: proposed changes to the policy that result in new or additional significant impacts or substantially increase the severity of previously anticipated significant impacts; results in new additional significant impacts or substantially increases the severity of previously anticipated significant impacts; or mitigation measures or alternatives previous proposed are not feasible and/or new mitigation measures that were not presented in the previous document would substantially reduce one of more significant effects. (CEQA Guidelines § 15162)</p> <p>While SBPC completely disagrees with the conclusion that a policy proposing a three-year extension in operations of four highly polluting power plants constitutes “minor technical changes or additions” to the previously adopted SED, your Staff Report makes this argument with <i>virtually no environmental or technical studies to back-up their position!</i> The report repeatedly indicates that they do not have the data to conduct any analyses or derive conclusions on the severity of major impact categories including air quality and water quality.</p>	

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	<p>The SED was drafted over ten years ago and these plants have been in operation for decades. Is the California Water Board stating that they nor any other state regulatory agency have any data on environmental impacts associated with the operation of these plants? In the ten years since the SED was approved, the properties just east and downwind of the power plant have experienced significant redevelopment projects including retail and restaurant development and more importantly, medium density residential projects. Has the California Water Board Staff identified and evaluated the impacts associated with extending power plant operations to this new development? The West Basin Water District constructed, ran, and studied a demonstration desalination plant on AES property since the SED was approved. Have the marine larvae data from this study and test project been reviewed by California Water Board staff? None of these analyses are apparent in the Staff Report.</p> <p>If these assumptions are correct, and none of these impacts have actually been evaluated, SBPC finds this truly troubling as it demonstrates a straight-out failure in meeting your legal obligations as a Lead Agency under CEQA. To assert lack of data as the basis for a “no impact”</p>	

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	<p>conclusion is legal suicide. SBPC can state with confidence that the proposed addendum for the action before your Board is woefully inadequate as there were no technical analyses conducted to justify the “conclusions” of no impact put forth in this document. As decision makers, it would behoove you to be very wary of adopting “cowboy CEQA”, as is clearly the case here.</p>	
033.15	<p>SBPC’s primary focus for the AES site is to discontinue operations so the City and all other interested parties can move forward with plans to purchase a portion of the site for the restoration of wetlands, the creation of native habitat and parkland for this park poor, very densely populated community. There are a number of other significant impacts associated with extending operations of the AES Plant that are not discussed in this correspondence including life-threatening air quality impacts, noise impacts and impacts to the ocean and our beautiful coastline. SBPC’s understanding is that other commenters are covering those issues at length. What we can say is that this policy amendment is a big step backward for the environment and for California’s battle against climate change.</p> <p>Ninety percent of California’s historic wetlands</p>	<p>Comment noted. Please see Master Responses 2.1, 2.3, 2.4, and 2.5.</p>

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	<p>have been eradicated and climate change and development will likely impact the remaining ten percent. Acquisition and restoration of the AES site provides a unique and rare opportunity to restore a significant amount of estuary, salt marsh, and sand dune habitat along the southern California coast. This site, if restored, would provide a critical refugia for wildfowl along the Pacific flyway and a biodiverse habitat and habitat linkages for migratory and resident birds and native coastal aquatic and terrestrial wildlife. The site would also restore natural coastal processes, which will benefit water quality and provide flood protection and a carbon sink to mitigate the impacts of climate change. Interpretive displays and passive recreational activities such as trails, would provide research and education opportunities, demonstrating the importance of wetland habitats for both humans and the non-human species that rely on them. Remediation and restoration of the site will likely unearth a number of cultural resources, which will help communicate and preserve the story of the Native Americans who frequented this site. There is so much to be gained and we are ready to jump in and get it done. So, we respectfully request that you please help us make this happen and vote</p>	

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	against extending AES Redondo Beach.	
034.01	On behalf of the Southern California Public Power Authority (SCPPA), I am writing you today to encourage you to take actions to keep the Resource Adequacy market as broad and competitive as possible.	Comment noted. Please see Master Response 2.2.
034.02	<p>SCPPA's Members operate under strict regulatory requirements and strive to do so in a way that maximizes reliability and operational flexibility in order to minimize the cost to our customers. Resource Adequacy (RA) is one of those requirements for all California Independent System Operator loads. In recent years, the cost for RA has increased dramatically, putting upward pressure on electric rates. To control these costs, utilities need access to power plants that can provide this RA, to ensure grid reliability. This will allow for a competitive market, where we have electric generation resources operational, to help control the cost of RA.</p> <p>On behalf our Members we encourage the State Water Resources Control Board to take actions that keeps the RA Market as broad and competitive as possible, thereby reducing cost impacts to our customers, many of who have</p>	Comment noted. Please see Master Response 2.2.

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	been impacted due to the COVID-19 crisis.	
035.01	I am writing on behalf of the Surfrider Foundation South Bay Chapter to urge the State Water Resources Control Board to not extend the Once-Through Cooling (OTC) Policy's compliance deadline for the AES Redondo Beach power generating facility for an additional year.	Comment noted. Please see Master Response 2.2.
035.02	While we appreciate the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) recommendation to reduce the extension for once-through-cooling (OTC) compliance for the AES Redondo Beach facility to one additional year, we are opposed to the extension of even this shortened time period beyond the December 31, 2020 deadline set in 2010.	Comment noted. Please see Master Responses 2.2.
035.03	It has been clearly demonstrated that additional power capacity from AES Redondo Beach is redundant and not needed;	Comment noted. Please see Master Response 2.2.
035.04	Continuing environmental impacts of this OTC system are unacceptable, killing millions of fish and other marine organisms and discharging warm water into the Santa Monica Bay contributing to algal blooms and further	Comment noted. Please see Master Response 2.3.

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	ecosystem degradation, especially pronounced in an enclosed bay and estuary such as Santa Monica Bay;	
035.05	Continued operation of the AES Redondo Beach power generating facility requires ongoing dewatering of some six acres of existing wetlands, and threatens the beneficial restoration of these wetlands upon the decommissioning of the AES Redondo Beach facility;	Comment noted. Please see Master Response 2.4 and Section 5.5 of the Staff Report, which includes a discussion of land use impacts.
035.06	Particulate matter emitted from the ongoing operation of the AES Redondo Beach power generating facility deposits upon and continues to pollute the waters of King Harbor and the Santa Monica Bay.	Comment noted. Please see Master Response 2.5.
035.07	For these reasons and more we strongly urge the State Water Resources Control Board to not extend this deadline beyond the long established deadline of December 31, 2020.	Comment noted. Please see Master Response 2.2.
036.01	As discussed below, POC opposes the proposed OTC Policy Amendment because the Amendment purports to rely upon a capacity decision made by the California Public Utilities Commission (CPUC) - a decision which itself is factually and legally deficient. However, the proposed OTC Policy	Comment noted. Section 5.2 of the Staff Report (Frequency of Power Plant Operation) was revised to clarify how “peaker plants” are used in maintaining grid reliability. Additionally, please see Master Response 2.2 regarding grid reliability, including Master Response 2.2.3 which discusses the need for energy produced by

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	Amendment exceeds the capacity mandates of the CPUC by providing for even more fossil-fueled resources than the CPUC ordered in its flawed decision, the OTC Policy Amendment conflicts with the CPUC’s legal mandates and policies to maximize renewable resources; and thus, exceeds the scope of the Board’s authority.	the four OTC facilities and Master Response 2.2.5 which discusses renewable energy.
036.02	Additionally, the Draft Staff Report admits that the OTC Policy Amendment lacks any scientific basis, and a comparison of the OTC Policy Amendment with the environmental documentation for the OTC Policy reveals that the Draft Staff Report violates CEQA. If approved, the OTC Policy Amendment would exacerbate the adverse environmental, economic, and human health impacts likely to result from the flawed CPUC decision.	Please see Master Response 2.2. The assertion that the Staff Report stated that the Amendment lacks scientific basis is misleading. Health & Safety Code § 57004 requires external scientific peer review of the scientific basis for any proposed rule, where ‘scientific basis’ and ‘scientific portions’ means ‘those foundations of a rule that are premised upon, or derived from, empirical data or other scientific findings, conclusions or assumptions establishing a regulatory level, standard or other requirement for the protection of the environment.’ (H&S Code § 57004, subd. (a)(2)). The State Water Board’s OTC Policy established technology-based performance standards in 2010 for owners and operators to achieve compliance with CWA section 316(b), requiring reduction of intake flow rates to a level commensurate with that which can be attained by closed-cycle cooling. This standard was based upon measured performance at other facilities as well as case study evaluations of wet cooling system retrofits conducted by a range of entities. Proposed revisions to the compliance dates in the OTC

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		<p>Policy do not revise these technology-based standards for compliance with the OTC Policy, nor do they establish any new regulatory level, standard or other requirement based upon new empirical data or scientific findings. Rather, revisions to the compliance deadlines, as informed by SACCWIS recommendations, implement the OTC Policy provisions as adopted in 2010 in order to address grid reliability concerns.</p> <p>Furthermore, please see Master Response 2.6. The proposed OTC Policy amendment and supporting Staff Report do not violate CEQA. The operation of OTC facilities affected by adoption of the OTC Policy was part of the environmental baseline considered by the State Water Board in the 2010 Final SED. Additionally, please see Master Responses 2.3 and 2.5.</p>
036.03	<p>Moreover, neither the Draft Staff Report’s analyses underlying the OTC Policy Amendment nor the CPUC’s 2019 Decision ordering immediate procurement of additional fossil-fueled resources for 2020-2023 have considered the effects of the COVID-19 pandemic on the need for additional power over the next two years. The overarching COVID-19 emergency’s impacts – impacts that have substantially decreased power usage in California – should be analyzed and considered by the SWRCB before it changes its</p>	<p>Comment noted. Section 5.2 of the Staff Report (Frequency of Power Plant Operation) was revised to clarify how “peaker plants” are used in maintaining grid reliability. Please also refer to Master Response 2.2. Additionally, see responses to comments 001.10 and 036.01.</p>

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	<p>policy. The Draft Staff Report bases its recommendations on now-outdated and inaccurate assumptions; thus it should be withdrawn and new analyses should be conducted that incorporate the dramatic new facts facing California and its need for power in 2020-2021. Given the material change in facts and circumstances facing California, this Board's failure to update its Staff's now-inapplicable analysis before reversing its OTC Policy would constitute legal error.</p>	
036.04	<p>The Notice describes the OTC Policy Amendment as based on a January 23, 2020 report by the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS), and states that the OTC Policy Amendment “also amends the compliance dates for Diablo Canyon Nuclear Power Plant Units 1 and 2 by reducing Unit 1 by two months and extending Unit 2 by eight months to November 2, 2024, and August 26, 2025, respectively.”</p> <p>The Notice further explains that the January 23, 2020 SACCWIS report was “based on the megawatt need identified” in the CPUC’s <i>Decision Requirement Electric System Reliability</i></p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2, as well as response to comment 001.10. During the January 23, 2020, SACCWIS meeting, CPUC SACCWIS member Edward Randolph abstained from the vote to approve the January 2020 SACCWIS report because CPUC attorneys advised that he could not vote in favor of the SACCWIS’ preferred Alternative 4 since it was not consistent with the CPUC’s recommended extensions for the OTC facilities in D.19-11-016. In March 2020, the CPUC approved D.20-03-028, which updates the CPUC’s recommendation for Ormond Beach from a one-year extension to a three-year extension, which is consistent with SACCWIS’ Alternative 4. Sections 5.1 and 5.5 of the Staff Report have been revised to reflect the CPUC’s updated recommendation for Ormond</p>

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	<p><i>Procurement for 2021-2023</i> (CPUC Decision).</p> <p>The SACCWIS report upon which the OTC Policy Amendment is based recommends that the OTC Policy be amended such that four once-through cooling power plants (OTC plants) - Alamitos, Huntington Beach, Orman Beach, and Redondo Beach – which under the OTC Policy are required to close by the end of this year - should instead be allowed to generate fossil fueled energy after 2020 for three years and one year, respectively, without first complying with the Clean Water Act and other environmental laws and regulations. Notably, SACCWIS committee member and CPUC representative Edward Randolph abstained from the decision to approve the SACCWIS Report.</p>	Beach.
036.05	<p>The CPUC Decision, upon which the SACCWIS report and thus the OTC Policy Amendment purports to be based, erroneously (1) recommended the extension of retirement dates for four OTC plants that are currently required to retire by December 31, 2020; and (2) required 3,300 MW of incremental procurement for system-level resource adequacy capacity based on a misguided and unsubstantiated conclusion that there is a potential for electricity system resource</p>	Comment noted. Please see Master Response 2.1, 2.2, 2.3, 2.4, and 2.5.

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	<p>adequacy shortages beginning in 2021. The CPUC Decision’s unsubstantiated conclusion about a potential shortfall resulted from a misinterpretation of an unreliable stack analysis and conjecture that available reserves may be less than the required 15% reserve margin above the average forecast peak load.</p> <p>The conjecture about available reserves was based on erroneous conclusions that renewable resources and imported capacity might not be reliably able to provide reserve power to serve load when needed. The CPUC’s conjecture about imported capacity resulted in constitutional violations. The CPUC Decision’s misguided and unsubstantiated assumptions resulted in part from the CPUC’s failure to meet its statutory duty to hold evidentiary hearings and in part because the CPUC based its decision on unsubstantiated assumptions.</p>	
036.06	<p>The CPUC’s decision to recommend to this Board that the OTC plants should not comply with the OTC Policy was erroneous because the CPUC did not first make a CEQA determination or consider whether such extensions would violate a variety of other laws and policies. The OTC Policy Amendment recommended in the Draft</p>	<p>Comment noted. Please see Master Response 2.1, 2.2, 2.3, 2.4, 2.5, and 2.6. Please also see responses to comments 036.01, 036.02, and 036.04. CEQA determinations related to proceedings or actions of the CPUC are not subject to State Water Board approval. Furthermore, the CPUC did not recommend that OTC</p>

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	Staff Report here claims to rely on the erroneous rationale of the CPUC Decision, thus amplifying the CEQA deficiencies that must be corrected.	facilities should not comply with the OTC Policy.
036.07	Both the CPUC Decision and the OTC Policy Amendment would increase localized air pollutants and other greenhouse gas emissions in disadvantaged communities and cause ocean life to suffer needlessly. The CPUC Decision, if allowed to be implemented through this Board's amendment of its OTC Policy, will not only increase greenhouse gas and other pollutants to the detriment of California's most vulnerable human populations and ocean dwellers, but may result in costly over procurement of reserve capacity to the detriment of ratepayers.	Comment noted. Please see Sections 5.5 and 5.6 of the Staff Report, which includes a discussion of environmental justice issues and Master Responses 2.1, 2.2, 2.3, 2.4 and 2.5. Please also see Master Response 2.6 regarding analysis of impacts.
036.08	To avoid these adverse consequences, POC filed an application for rehearing of the CPUC Decision. An application is required as a condition precedent to challenging a CPUC decision in the courts, and "[t]he purpose of an application for rehearing is to alert the CPUC to a legal error, so that the CPUC may correct it expeditiously." The CPUC has not yet determined whether to correct the legal errors to which POC alerted the CPUC.	<p>Comment noted. Please see Master Response 2.1, 2.2, 2.3, 2.4, and 2.5. Please also see responses to comments 001.10 and 005.01. Additionally, it should be noted that a rehearing and any litigation between CPUC and counterparties can proceed separately to the proposed OTC Policy amendment and are outside the scope of the State Water Board's authority.</p> <p>The CPUC also acknowledges that the authority for OTC compliance deadline extensions ultimately rests with the [State] Water Board" in D.19-011-016. As well as D.19-</p>

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	<p>Unfortunately, the Staff Report not only relies upon some of the legal errors made by the CPUC but exacerbates the resulting harm to the environment, to disadvantaged communities, and to ratepayers. The Board should reject the OTC Policy Amendment, or at minimum the Board should delay its consideration of the Staff Report until the CPUC and the courts review and correct the deficient CPUC Decision that forms the basis of the Draft Staff's Report's analyses and recommendation.</p>	<p>011-016, the more recent CPUC D.20-03-028 echoes the above stance by acknowledging that the ultimate authority over OTC compliance deadlines rests with the Water Board.</p>
036.09	<p>The CPUC Decision relies in large part on an inaccurate description made in the June 20, 2019 Ruling of Assigned Commissioner and Administrative Law Judge Seeking Comment on Policy Issues and Options Related to Reliability (6/20/2019 Ruling) of a stack analysis conducted by staff. The 6/20/2019 Ruling's inaccurate description of the stack analysis constitutes demonstrably unreliable double hearsay. The CPUC Decision itself admits that the staff analysis did not meet the standards that the CPUC developed and has previously used and concedes that the fossil-fueled energy that could be provided by the OTC plants after 2020 may not be actually necessary.</p>	<p>Comment noted. Please see Master Response 2.1, 2.2, 2.3, 2.4, and 2.5. The State Water Board does not have the authority or jurisdiction to make determinations regarding uncertainty or supply stack analysis.</p>

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036.10	<p>The CPUC Decision’s reliance on a flawed CAISO analysis is similarly unsubstantiated and unreliable. According to the CPUC Decision, CAISO assumed that solar resources “do not provide the type of capacity needed to ensure system reliability in real time.” This inaccurate assumption reveals that the CPUC failed to appropriately value battery-plus-storage capacity, which constitutes legal error because the CPUC was required to consider “every element of public interest affected by facilities which it is called upon to approve.” While POC argued at the PUC - and in its application for rehearing - that no new resources are in fact needed, at the least, the PUC was required to assess and choose the least environmentally harmful choice for new resources. The PUC failed to select the least environmentally harmful choice because battery-plus-storage projects must be considered as a cost-effective alternative to fossil-fueled resources in order to comply with statutory requirements to “rely upon zero carbon-emitting resources to the maximum extent reasonable.”</p> <p>The CPUC Decision also erroneously assumed that existing fossil-fueled resources are cheaper than new resources. This conclusory assumption required the CPUC to ignore data and evidence</p>	<p>Comment noted. Please see Master Response 2.2, as well as responses to comments 036.01 and 036.08. Additionally, it should be noted that OTC facilities included in the Amendment do not and will not compete with hybrid or other resources in the all-source solicitations of the CPUC, as OTC facilities are not eligible to be counted in the 3,300 MW of new capacity procurement ordered by the CPUC in D.19-011-016.</p>

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	that renewable resources can be procured at a lower cost than existing fossil-fuel resources, evidence that was ignored by the CPUC in reaching its erroneous conclusions that power was needed from the designated OTC plants.	
036.11	Moreover, despite the overwhelming requests from many parties, the CPUC acknowledged that it did not and would not place a resource adequacy value on any kind of hybrid resources before approving of extensions for the OTC Plants and ordering additional procurement.	Comment noted. The State Water Board does not have the authority or jurisdiction to make determinations regarding the impact of hybrid resources on grid reliability.
036.12	<p>The CPUC Decision lacks a sufficient evidentiary basis for concluding that the potential for resource adequacy shortages exists because their analysis shows that the grid will maintain reliability without the OTC extensions – and without new procurement whatsoever. As a result, no substantial evidence exists in the record to support the CPUC Decision’s findings regarding any purported need for system resource adequacy – neither the OTC plants nor an additional 3,330 MW by the Summer of 2021 nor any combination of the two.</p> <p>The Board cannot rely on the CPUC’s Decision or its purported analysis for the need for the OTC</p>	Comment noted. Please see responses to comment 036.01, 036.08, 036.09, and 036.10.

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	<p>plant extensions because the CPUC’s Decision failed to follow the State’s requirement that zero carbon-emitting resources be relied upon to the maximum extent reasonable. The CPUC’s Decision also is inconsistent with the loading order. The CPUC did not and could not make the requisite findings that it has identified and required adherence to a portfolio that “shall rely upon zero carbon-emitting resources to the maximum extent reasonable.” Instead, the CPUC requested all-source procurement, including additional fossil-fueled procurement. Because the CPUC Decision added fossil-fuel procurement while failing to consider better GHG-reducing alternatives, it contradicted California law and policy that mandates reliance upon zero carbon-emitting resources to the maximum extent reasonable, as well as adherence to the loading order. Thus, the Board should not rely on the CPUC’s flawed Decision to overturn its OTC Policy here.</p>	
036.13	<p>SACCWIS’s recommendation, which is based on the CPUC Decision’s unsupported reliability claims, and the proposed OTC Policy Amendment, which is based on SACCWIS’ unsupported analysis, should not be followed by this Board for the same reasons.</p>	<p>Comment noted. Please see responses to comments 036.01, 036.08, 036.09, and 036.10.</p>

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036.14	<p>Although the CPUC Decision states that the “June 20, 2019 ruling also noted that the stack analysis shows that based on current knowledge, by 2021 the system could end up relying on all available resources, including nearly all of the available MIC, which is roughly double the historical usage of imports for system reliability purposes,” this statement could not be based on credible evidence as a matter of law. Relying on the available MIC could not be “roughly double the historical usage of imports for system reliability purposes” because CAISO uses historical import usage data to calculate the MIC.</p>	<p>Comment noted. Additionally, it should be noted that resources that are considered reliable in the CAISO RA program are those under RA contract, and only a portion of the Maximum Import Capability generally counted towards RA given the dynamics of the electrical imports market.</p>
036.15	<p>Nevertheless, the CPUC expresses an unsubstantiated concern that imports are unreliable “because California has less control over the resources,” and goes so far as to expressly prohibit LSEs from relying on imports for more than twenty percent (20%) of the mandated incremental capacity. The CPUC Decision fails to include any reasoning supporting the 20% limit that it imposes. Thus, the Decision lacks any basis on which to impose its restriction on interstate commerce.</p> <p>Erecting these kinds of barriers against interstate trade is prohibited by the United States</p>	<p>Comment noted. Please see Master Response 2.2. Please also see responses to comments 036.09 and 036.10.</p> <p>Additionally, arguments regarding the legal adequacy of the CPUC decision must be pursued in a separate proceeding. The State Water Board has no authority to address underlying concerns regarding energy policy and barriers to interstate trade.</p>

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	<p>Constitution’s Dormant Commerce Clause as well as by California law.³¹ “State laws that discriminate against interstate commerce face ‘a virtually per se rule of invalidity.’” Because the CPUC Decision lacks any legitimate purpose that could justify its arbitrary 20% limit on imports, the CPUC Decision discriminates against interstate commerce and is invalid.</p>	
036.16	<p>SACCCWIS’s recommendation, which is based on the CPUC Decision’s treatment of imports, and the proposed OTC Policy Amendment which is based on SACCCWIS’ analysis, are invalid for the same reasons and should not be relied upon by this Board to overturn its OTC Policy with respect to the OTC plants at issue here.</p>	<p>Comment noted. Please see Master Response 2.2, as well as responses to comments 001.10 and 036.15. While the SACCCWIS recommendation is informed by the findings set forth in the CPUC decision, the SACCCWIS report and analysis represents the recommendations to the SACCCWIS agencies collectively, pursuant to their role as an advisory body to the State Water Board. Furthermore, in the May 2020 Joint Energy Agency Letter, the CPUC, CEC, and CISO unanimously supported the recommendation in the January 2020 SACCCWIS Report.</p>
036.17	<p>The Staff Report appropriately notes that Health & Safety Code section 57004 “requires external scientific peer review of the scientific basis for any rule proposed by any board, office, or department within the California Environmental Protection Agency.” The Staff Report concludes, however, that peer review requirements do not apply</p>	<p>Please see response to 036.02.</p>

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	<p>because the OTC Policy Amendment “is not based on scientific data.” The glaring admission that the OTC Policy Amendment is not “premised upon, or derived from, empirical data or other scientific findings, conclusions, or assumptions establishing a regulatory level, standard, or other requirement for the protection of public health or the environment” alone requires the Board to reject the OTC Policy Amendment.</p> <p>As the Staff Report explains, the OTC Policy establishes “uniform, technology-based standards to implement federal Clean Water Act (CWA) Section 316(b) and reduce the harmful effects associated with cooling water intake structures on marine and estuarine life.” If the Staff Report had ascertained whether the OTC Policy Amendment served the OTC Policy’s purpose, “empirical data or other scientific findings, conclusions, or assumptions” would have been required. The Staff Report and its recommendations lack these required findings and data and thus should be rejected by the Board.</p>	
036.18	The Staff Report fails to comply with Public Resources Code section 21159 which requires that the Board perform an environmental analysis when it establishes performance standards. The	Please see Master Response 2.1 and 2.6, as well as response to comment 036.02.

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	<p>“environmental analysis shall take into account a reasonable range of environmental, economic, and technical factors, population and geographic areas, and specific sites,” and, at a minimum, the environmental analysis must include all of the following:</p> <ul style="list-style-type: none"> (1) An analysis of the reasonably foreseeable environmental impacts of the methods of compliance. (2) An analysis of reasonably foreseeable feasible mitigation measures. (3) An analysis of reasonably foreseeable alternative means of compliance with the rule or regulation. (4) For a rule or regulation that requires the installation of pollution control equipment adopted pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), the analysis shall also include reasonably foreseeable greenhouse gas emission impacts of compliance with the rule or regulation. <p>The environmental analysis provided in the Staff Report fails to comply with any of these requirements because it fails properly to assess</p>	

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	the baseline environmental impacts. Under CEQA, the baseline must reflect the “real conditions on the ground.” The real conditions on the ground must reflect that, but for the OTC Policy Amendment, the four OTC plants will not operate after 2020 at all.	
036.19	In contrast with actual, on-the-ground baseline conditions, the OTC Policy Amendment has the potential to add 3,742 MW of fossil-fueled energy in 2021, 2,894 MW of fossil fueled energy in 2022, and 2,894 MW of fossil-fueled energy in 2023.	Please see Master Response 2.2 and 2.6.
036.20	The GHG impacts accruing directly from operation of these OTC plants after 2020 were not considered at the time the Final Substitute Environmental Document was approved in 2010.	Please see Master Response 2.6. The 2010 Final SED assessed environmental effects of adopting the OTC Policy, which did not require any facility to shut down or otherwise cease operations. The OTC Policy required measures to reduce impingement and entrainment impacts to marine organisms resulting from cooling water intake structures pursuant to CWA Section 316(b). Impacts resulting from operation of these facilities were considered as part of the baseline for comparison to determine whether reasonably foreseeable significant adverse environmental impacts would result from compliance methods set forth in the OTC Policy.
036.21	Adding greenhouse gas emissions clearly contradicts myriad California statutory mandates	Please see Master Response 2.1, 2.2, 2.5 and 2.6. Additionally, in D.19-11-016, the CPUC states that no

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	<p>which require that greenhouse gas emissions be reduced during this time period, and which recognize reasons for requiring greenhouse gas emissions reductions, including avoiding adverse impacts on disadvantaged communities:</p> <p><i>Continuing to reduce greenhouse gas emissions is critical for the protection of all areas of the state, but especially for the state’s most disadvantaged communities, as those communities are affected first, and most frequently, by adverse impacts of climate change, including increased frequency of extreme weather events such as drought, heat, and flooding. The state’s most disadvantaged communities are also disproportionately impacted by the deleterious effects of climate change on public health.</i></p> <p>As prior CPUC decisions have acknowledged, “existing natural gas plants are located disproportionately in disadvantaged communities” so “there is a nexus between analysis of natural gas resources and disadvantaged communities impacts.”</p>	<p>natural gas plants will be included in the 3,300 MW of new procurement.</p>
036.22	<p>Adding greenhouse gas emissions also conflicts with the scientific consensus regarding the reductions necessary to avoid catastrophic</p>	<p>Comment noted. Please see Master Response 2.5 and response to comment 036.21.</p>

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	<p>climate change impacts. In 2018, Executive Order B-55-18 recognized that “scientists agree that worldwide carbon pollution must start trending downward by 2020, and carbon neutrality – the point at which the removal of carbon pollution from the atmosphere meets or exceeds emissions – must be achieved by midcentury” and, accordingly, established a “new statewide goal...to achieve carbon neutrality as soon as possible.”</p>	
036.23	<p>The OTC Policy Amendment <i>increases</i> pollution and other greenhouse gases in disadvantaged communities without any scientific analysis whatsoever, in violation of CEQA.</p>	<p>Comment noted. Please see Master Response 2.1, 2.2, 2.5, and 2.6, as well as responses to comments 005.01 and 036.21. Please also see Sections 5.5 and 5.6 the Staff Report, which includes a discussion of environmental justice issues.</p>
036.24	<p>The Final Substitute Environmental Document did not and could not have considered recent climate science and legislation, or the post-2020 climate change impacts of Alamitos, Huntington Beach, Ormond Beach, or Redondo Beach generation stations.</p> <p>Nor could the Final Substitute Environmental Document have considered the impacts of Clean Water Act non-compliance after 2020. Approval of the OTC Policy Amendment would require withdrawal by the Secretary of the Resources</p>	<p>Please see Master Response 2.2 and 2.6. The proposed OTC Policy amendment is squarely within the provisions set forth in the OTC Policy as originally adopted and does not constitute a new project. Nonetheless, the State Water Board has prepared an addendum in accordance with California Code of Regulations, title 14, section 15164.</p> <p>Additionally, approval of a certified regulatory program is not specific to each decision by an agency, but rather covers a range of agency actions that may be taken pursuant to that agency’s regulatory authority covered by</p>

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	<p>Agency of its Public Resources Code Section 21080.5 certification, because the OTC Policy Amendment neither requires evaluation consistent with environmental protection purposes nor minimizes significant biological and greenhouse gas emissions effects. To the contrary, the OTC Policy Amendment constitutes a project under CEQA which is different from and in conflicts with the purpose of the OTC Policy that was described and assessed in the Final Substitute Environmental Document.</p>	<p>the certified program.</p>
036.25	<p>The Center for Infectious Disease Research and Policy’s (CIDRAP) recent paper on the pandemic draws conclusions about the duration and severity of the COVID-19 pandemic based on its analysis of eight historical influenza pandemics. CIDRAP states that “the length of the pandemic will likely be 18 to 24 months” and historical pandemics have seen that “[i]n some areas, particularly in Europe, pandemic-associated mortality was higher the second year.”</p> <p>While the second year of the current pandemic may be worse, the first year already appears to be extraordinarily difficult. In the U.S., 30.3 million workers have filed for unemployment. As of May 11, 2020, confirmed COVID-19 deaths have</p>	<p>Comment noted. Please see Master Response 2.2. Please also see responses to comments 001.10, 036.09, and 036.10.</p>

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	<p>reached 79,600 and continue to climb daily.</p> <p>In relation to energy use, the International Energy Agency forecasts that U.S. energy demand will fall by 9% in 2020. From a California electricity perspective, since the COVID-19 lockdown in California, CAISO has seen a 5% to 8% lower load on weekdays.</p> <p>To the extent the Board is not inclined to reject the proposed OTC Policy Amendment outright for the reasons set forth herein, at a minimum the Board should first request that the CPUC address the impact of forecasts by health experts that the pandemic will last for another two years and that the CPUC reassess the continuing validity of its 2019 conclusions concerning electricity demand in 2020-2023.</p>	
036.26	<p>As discussed above, the CPUC Decision recommendation to allow procurement from the four OTC plants after 2020 lacks any factual support. However, even if one were to accept the unsubstantiated conclusion in the CPUC Decision that 3,300 MW of additional capacity should be procured, extending Alamitos, Huntington Beach, and Ormond Beach for three years, and Redondo Beach for one year would not, as the Draft Staff</p>	<p>Comment noted. Please see Master Responses 2.2 and 2.6. Please also see responses to comments 001.10, 014.20, 036.09, and 036.10.</p>

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	<p>Report suggests, “provide a ‘bridge’ of roughly 3,740 MW in 2021 and roughly 2,230 MW in 2022 and 2023 as the 3,3000 MW of new procurement comes online by 2023” To the contrary, extending Alamitos (approximately 1,163 MW), Huntington Beach (approximately 215 MW), and Ormond Beach (approximately 1,516 MW) for up to three years would result in approximately 2,894 MW in 2022 and 2023.</p> <p>More importantly, to “bridge the gap” by maintaining reliability until the online dates for the new 3,300 MW of capacity required by the CPUC Decision, no extension whatsoever would be needed in 2023, because by 2023 the full 3,300 MW of new capacity will already be online. In 2022, 2,475 MW (75% of 3,300 MW) would be online under the CPUC Decision’s orders, so only 825 MW would be needed to “bridge the gap” in 2022. In 2021, 1,650 MW (50% of 3,300 MW) would be online, so only 1,650 MW would be needed to “bridge the gap” in 2021.</p> <p>Additionally, the CPUC instructed load serving entities (LSEs) to bring on more than 50% of the CPUC-ordered capacity in the first year if possible.</p>	

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	<p>Large procurements that exceed 50% of 3,300 MW minimum the CPUC mandated must come online by August 1, 2021 are already underway. For instance, Southern California Edison (“SCE”) has contracted for 65% of its total need and the 65% will come online by the 2021 deadline. Thus, the Staff Report’s “bridge the gap” rationale does not reflect the up-to-date facts on the ground; and no basis exists for this Board to change its OTC Policy at all, much less in a manner that allows for more OTC plant procurement than ordered by the CPUC.</p>	
036.27	<p>Notwithstanding the lack of a factual basis for the procurement ordered by the CPUC in the CPUC Decision, the OTC Policy Amendment impermissibly provides for OTC plant procurement well beyond the CPUC-established capacity needs. The OTC Policy Amendment proposes to allow Alamitos, Huntington Beach, and Ormond Beach to operate for three years after 2020, and Redondo Beach for one year. The CPUC recommended three years for Alamitos and Huntington Beach, two years for Redondo Beach, and one year for Ormand Beach.</p>	<p>Please see Master Response 2.2 as well as responses to comments 001.10 and 036.01.</p>
036.28	<p>In going beyond the CPUC’s determinations about system reliability needs, the Board interferes with</p>	<p>Please see Master Responses 2.2 and 2.5. Please also see responses to comments 001.10, 036.01, and</p>

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	<p>the CPUC’s ability to carry out its policies and statutory mandates. The CPUC comprises the only state regulatory body with authority to consider system reliability. This Board has no authority to interfere with the CPUC’s ability to carry out its legislative mandates.</p> <p>As discussed in Section II above, relevant legislative mandates include the requirement for the CPUC to identify a portfolio that relies upon zero carbon-emitting resources to the maximum extent reasonable. The CPUC must also ensure that load serving entities: (1) minimize impacts on ratepayers’ bills and (2) minimize localized air pollutants and other greenhouse gas emissions, with early priority on disadvantaged communities. As the CPUC has recognized in the past, too much capacity could deter the new resources required by the Loading Order, and “too much system capacity represents unnecessary ratepayer costs.” By making fossil-fueled resources available far beyond what the CPUC anticipated at the time of the CPUC Decision, the Board’s actions are likely to interfere with the CPUC’s ability to carry out its legislative mandates – including those mandates listed above.</p>	<p>036.16.</p> <p>Additionally, it should be noted that CPUC made explicit recommendations regarding proposed OTC facility compliance deadline extensions in D.19-011-016 and reaffirmed this stance in D. 20-03-028.</p> <p>Furthermore, the Amendment does not preclude the State Water Board or the CPUC from acting according to their individual responsibilities and legal requirements. Furthermore, the SACCWIS’ Memorandum of Agreement states that the agencies and entities comprising the SACCWIS shall commit to working cooperatively towards fulfilling the obligations of the SACCWIS as described in the OTC Policy. Nothing contained in the Memorandum of Agreement shall be construed to limit the rights or authority of any agency or entity participating on the SACCWIS.</p>
036.29	For the reasons stated above, the Board should	Comment noted. Please see Master Responses 2.1,

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	reject the OTC Policy Amendment and thus avoid the adverse environmental, economic, and human health consequences that would otherwise result. Alternatively, the Board should defer any adoption of the OTC Policy Amendment unless and until the CPUC decides POC’s pending application for rehearing of the CPUC Decision and revises the CPUC Decision so as to reflect the reduced demands resulting from the COVID-19 crisis.	2.2, 2.3, 2.5, and 2.6. Please also see responses to comments 001.10, 036.09, 036.16, 036.24, and 036.25.
037.01	We do so in strong support of a historic opportunity to transition long-time coastal power plants into much needed coastal wetlands, open space preservation, park lands and coveted coastal access. The redevelopment of the Redondo Beach power plant site offers a unique, and perhaps, once in a generation opportunity in the Greater Los Angeles area for a partnership of which the State, AES, the land owner, local municipalities, Tree People and other stakeholders will be proud of.	Comment noted. Please see Master Responses 2.1 and 2.4.
037.02	To make this strategy successful, collaboration and additional investment is required from the private sector, public agencies and nongovernmental entities; we view the transition of coastal power plants into public green space as an exceptional opportunity for	Comment noted. Please see Master Responses 2.1 and 2.2.

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	private landowners, NGO's, and state and local government to work hand in hand to support our shared values of equity, public access, ecological restoration, environmental literacy and green infrastructure.	
037.03	Tree People has been discussing our shared values with AES and the new landowner, SLH Investments, and are in the early stages of a working relationship with AES and SLH to realize important community benefits and resources for site transition and open space preservation that would accrue with additional operating time. As direct land stewards and a land trust, Tree People and its affiliated land trust Mountains Restoration Trust steward over 3,000 acres of precious lands, so we are well-positioned to provide guidance and leadership on the rare opportunity for a cohesive vision for coastal wetlands, parklands, trails, public access, educational activities and community services on the 51-acre Redondo Beach parcel.	Comment noted. Please see Master Response 2.1.
037.04	We applaud the efforts of the City of Oxnard and GenOn in coming to mutual agreement on site remediation for the Ormond Generating Station. We hope this model can be replicated	Comment noted.

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	elsewhere in the state to ensure a clean, safe, and sustainable future for surrounding communities and coastal resources. As the COVID-19 crisis reduces municipal and state budgets, these partnerships will be more crucial than ever in bringing private funding into the public interest.	
037.05	We ask that the State Water Board, through its policy amendments, promote efforts that leverage existing infrastructure for appropriate site cleanup and the creation of critical coastal access, open space, ecological restoration and meaningful creation of education programs that will connect people from all communities to natural environments they may otherwise never experience. TreePeople envisions bringing the private sector, public agencies, the community and other nongovernmental organizations together to create a special public place where diverse communities from all over the region can have much needed coastal access, environmental programming and a direct connection to California’s spectacular coast. We appreciate the opportunity to provide these comments on California’s precious coastal resources and look forward to a positive decision in support of our shared values of	Comment noted. Please see Master Response 2.1.

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	equity, public access, ecological restoration, environmental literacy and green infrastructure.	
038.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
038.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	<p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
038.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Comment noted. Please see Master Response 2.5.
038.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
038.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.

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039.01	I support the three-year extension that AES is requesting for the powerplant in Redondo Beach.	Please see Master Response 2.1.
039.02	An extension will have a minimal impact on the environment, but it will have a huge positive impact on the future of our city. The extension would enable us to turn 25 acres of the existing site into public open space. The money from continued operation of the plant would be plowed back into the site, including millions for clean-up of the property. It will also generate enough cash flow for the property owner that he has agreed to save half the site as open space forever.	Please see Master Response 2.1.
039.03	Without the extension, the property will undoubtedly fall into disrepair once the plant is closed because there is no money for rehabilitation of the land and no incentive for the property owner to dedicate so much land to open space since it doesn't generate revenue for him.	Please see Master Response 2.1.
039.04	Yes, this deal is all about money – the money our city needs to do something positive with this property after the AES plant closes. Please think of the future of our city and allow the extension.	Please see Master Response 2.1.

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040.01	<p>The issue of the AES Power Plant is all about money –but not in the way you might think.</p> <p>It’s about the money the city doesn’t have to turn the property into a park. It’s about the money that it will take to clean up the site that has been used as an industrial site for a century. It’s about the money the new property owner can get by continuing to use the site for an industrial use (which is completely permitted under the current zoning).</p> <p>Extending the plant’s operations for an additional three years will guarantee half the site will remain open space, provide millions for site clean-up and give us a head start on redeveloping the property.</p>	Please see Master Response 2.1.
040.02	Let’s not be short-sighted. Please approve the three-year extension.	Please see Master Responses 2.1 and 2.2.
041.01	<p>Too soon could create an insufficient energy supply, leaving customers vulnerable to power outages.</p> <p>I support keeping the AES plant in Redondo Beach operating until a viable plan to provide power to the area has been developed.</p>	Please see Master Response 2.2.
041.02	The political people mentioned in the article who support the closing of this plant are also the same elected officials that are supporting building	Comment noted. Please see Master Response 2.1.

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	thousands of new housing units in our area. The logic behind supporting both of these issues makes no sense to me.	
041.03	We continue to get request to conserve power during heat waves. With reduced capability to provide power and more residents needing power we will return to the dark ages.	Please see Master Response 2.2.
042.01	There is no way Redondo Beach can turn the AES power plant site into a park on its own. The city does not have the money to buy the property or even enough to clean it up after years of operation as a power plant.	Please see Master Response 2.1.
042.02	If you vote to extend operations for three years, however, the new property owner will guarantee that 25 of the 51 acres will stay open space forever. In addition, the operations extension would mean AES would contribute millions to cleaning up the site.	Please see Master Response 2.1.
042.03	These are the critical items we need to make sure we keep that land from falling into disrepair after the plant is retired or, worse still, being developed into something else that will haunt us for the next 50 years.	Comment noted.

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042.04	Please support the extension and enable us to preserve half of this property as open space.	Please see Master Response 2.1.
043.01	I support the 3 year extension proposed by AES for its power plant in Redondo Beach.	Please see Master Response 2.1.
043.02	As a longtime resident of Redondo Beach I know we all want to see the plant shut down as soon as possible, but the bigger priority is to see the property remediated and redeveloped as soon as possible. Extending the plant for 3 years best achieves this primary objective. A 3 year extension will generate the revenue necessary to remediate the site, while at the same time triggering an agreement with the property owner to reserve 25 acres of the site as open space. Another 3 years of operation will also allow the city and the property owner to properly negotiate a plan for what will come once the power plant is torn down.	Please see Master Responses 2.1.
043.03	Closing the plant without an extension means years, and possibly decades, of infighting about what should be built on the property, who will pay for the clean-up and how much, if any, open space will be included in the final plan. We've already gone down that road before as a city and Mayor Brand hasn't	Comment noted. Please see Master Response 2.1.

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	shown he has an viable plan for the site if it closes without an extension.	
043.04	The future of our city is at stake, and I urge you to support the AES 3 year extension so that the site can become something we all want and can all enjoy.	Please see Master Response 2.1.
044.01	My opinion on the AES plant is that it should of never gotten to this point in the first place. I fit had been handled properly by the Mayor and council members of Redondo Beach, the AES plant would have been redone by the AES company, to a smaller and cleaner run power plant. They would have taken care of the clean up and put in a smaller park.	Comment noted.
044.02	I have lived in Redondo Beach for 45 years and have seen Mayor's come and go, but this project has been the worse handled than any other project ever before.	Comment noted.
044.03	Through the years we have had terrible electrical problems. This was a smaller home community till all the 2 homes on a lot were built. I am not against progress, as it has improved the area and raised the value of our property. But, they have not improved the electrical problems in this area. My	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>understanding is that the sub-station has not been up graded since 1968, that is when the average house was 900 square feet or less.</p> <p>We have had power outages, lights dimming and have had to choose between Christmas lights or watching TV through the years. We even have problems getting the higher speed internet in this area that Frontier offers due to the power limits.</p> <p>I do not understand where or how the people moving into this area think we will get our power, if we don't have power plants. Everyone takes the attitude of, "NOT IN MY BACKYARD". But the homes that are being built are 2,800 s.q. feet to 4,000 sq. feet, that is a lot of electricity used. So this will need to be brought in somehow. But, now they want all the power lines taken down. They don't understand the cost and work on underground electricity.</p>	
044.04	<p>There has to be some compromise in this problem so that all issues are addressed. The answer is not for the current owners to walk away. And, the answer is not just a large park on that site, as the city needs to have some revenue coming in, on that</p>	<p>Please see Master Response 2.1.</p>

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	property. Please look at some options and offers when dealing with this council board.	
044.05	I quite going to the meeting after the present Mayor was in about a year, I felt what the people were saying wasn't being heard and the council members couldn't even agree with each other. This is a wonderful city not going anywhere and not advancing with the times. We are also dealing with a waterfront problem due to his miss handling.	Comment noted. Please see Master Response 2.1.
044.06	There are ways to address the attractiveness of the buildings and I know there have been advances of minimizing pollution, if done properly. We will be paying higher prices than we are now for our electricity, if something isn't done for the people of Redondo Beach. I understand that the previous plant was only bringing in about 40% usage for this area, but was larger years ago. There could be clean electricity brought in and more management on water pollution. With all the advances in this area, there shouldn't be any pollution.	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.
044.07	Please don't be part of this cities problem, PLEASE BE A SOLUTION OF FURNISHING ELECTRICITY to the city in a safe environment.	Please see Master Response 2.1.

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045.01	I am writing to you to ask you to support a three-year extension of the operations of the AES power plant in Redondo Beach.	Please see Master Response 2.1.
045.02	It is time for the AES plant to close, but if it closes with no guarantees of what comes next or the money to make that happen, Redondo Beach will be saddled with an eye sore and a deteriorating power plant, possibly for decades.	Please see Master Response 2.1.
045.03	The smart move and the one that enables the plant to most effectively transitioned into something positive for our community is the one the new owner has put on the table –allow the plant to continue operating through 2023, lock in a \$14 million payment from AES to clean up the site and guarantee that at least 25 acres of the site are saved as permanent open space.	Please see Master Response 2.1.
045.04	This is the surest way for the power plant site to be redeveloped in a way that all local residents can benefit. This process in Redondo Beach will take more effort than most other cities. We will have to take the process to voters in order to agree on the land. This will likely take more than just three years anyhow. It seems logical to use this time wisely while keeping three-year safety net the plant would provide in terms of emergency power generation at	Please see Master Responses 2.1 and 2.2.

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	a time when Southern California can use all of the available power capacity possible.	
045.05	Continuing the low-level emissions from the plant for another three years, after the plant has operated for more than 100 years, is a smart tradeoff for guaranteeing that something great will happen at that site to benefit all of us for decades to come.	Please see Master Responses 2.1 and 2.5.
045.06	Again, I encourage you to support the proposed three-year extension.	Please see Master Response 2.1 and 2.2.
046.01	While I would love to see the powerplant shut down tomorrow, shutting it down without a plan and without the funding necessary to clean up the site and turn it into something positive for our city makes no sense.	Comment noted. Please see Master Response 2.1.
046.02	That is why I am encouraging you to support a three-year extension for the AES powerplant. Three more years will mean millions of dollars to clean up the property. It will also mean half of the property will be forever saved as open space.	Please see Master Response 2.1.
046.03	Let's be smart about the future and not take the easy and emotional option. Yes, everyone wants the plant shut down, but without money to clean the site, we may wait decades until something new	Comment noted.

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	happens there. And without a guarantee about the open space, we may end up with development that is far worse for Redondo residents than a powerplant.	
046.04	As a registered voter and a resident of North Redondo there is nothing more that I would love to see than to remove the power plant & make a great destination for families of Redondo & all of the South Bay to enjoy. However if we rush this thing it'll mean less space for families like mine and less money for the city	Please see Master Response 2.1.
046.05	Please support the AES extension.	Please see Master Response 2.1 and 2.2.
047.01	I am writing to support the AES request to continue operations of its Redondo Beach power plant site for three more years.	Please see Master Response 2.1.
047.02	<p>I feel like I know this are a better than most people. I was born and raised in the South Bay and I have worked as an insurance agent, a restaurant owner and a police officer, so I have spent a great deal of time talking to people and getting a feel for what they would like to see in our community.</p> <p>The one thing no one disagrees on is the fact that they would like to see the AES power plant retired</p>	Comment noted. Please see Master Response 2.1.

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	and turned into something everyone can enjoy. Unfortunately, it's not as easy as locking the doors, blinking your eyes and creating a park. It takes time. It takes the willingness of the property owner. And, above all, it takes money.	
047.03	The best way to make it happen is to allow the plant to continue operating through 2023. Fourteen million dollars of there venues generated during that time will go toward restoring and cleaning up the property. Moreover, if he is able to generate revenues through 2023, the property owner will guarantee that half the site will be retained as open space forever. In addition, the three years of operations will enable the city and the property owner time to negotiate and settle on a use for the land that benefits everyone.	Please see Master Response 2.1.
047.04	Rushing the closure for the plant, especially since a new owner just recently took over the property, all but guarantees that there is not be enough money to clean up the site and turn it in to open space for many, many years.	Please see Master Response 2.1.
047.05	I believe every one recognizes that keeping the plant open for three years has some minor environmental impacts, but once you consider the tangible benefits of operating through 2023, the	Please see Master Responses 2.1, 2.2, 2.3 and 2.5.

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	choice is clear. I hope you will join me in supporting this proposal and vote in favor of the three-year extension being proposed.	
048.01	I understand that the once-through cooling method employed at the AES facility is in the process of being retired. We must not be too hasty with the closure of AES –particularly with the COVID-19 monkey wrench that has changed the financial landscape and priorities of California and its populace.	Please see Master Response 2.1 and 2.2.
048.02	I am writing in support of allowing AES to keep generating and selling electricity for three more years.	Please see Master Response 2.2.
048.03	First, the company will transfer \$14 million to the buyer for environmental cleanup —compared to just \$6.5 million with a two-year extension, and \$1.5 million with one year. Additionally, the buyer would preserve up to 25 acres as permanent open space only with a three-year extension for AES. He only agreed to 12 acres of open space with a two-year extension his commitment falls to 12 acres of open space and a paltry 4 acres with one year. A longer extension would allow AES to generate more revenue from electricity sales, and in turn the	Comment noted. Please see Master Response 2.1.

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	company would provide more funds to the buyer for site cleanup.	
048.04	Second, premature closure could create an insufficient energy supply, leaving customers vulnerable to power outages. As noted above, unrealistic timelines and the devastating consequences of COVID-19 has placed California in an even worse position to convert to other forms of energy quickly.	Please see Master Response 2.2.
048.05	<p>Moreover, more research is needed into alternate forms of energy. Such alternate forms of energy are not the panacea, as they create a different kind of pollution.</p> <ul style="list-style-type: none"> • Biomass energy, which is often touted as a much better choice than fossil fuels, mainly relies on deforestation and burning it releases carbon dioxide into the atmosphere. (https://www.huffpost.com/entry/green-nightmare-burning-b b 395553) • Wind energy can lead to mountaintop removal (https://vtdigger.org/2013/07/04/lowell-mountains-wind-project-the-great-divider/) 	Comment noted. Please see Master Response 2.2.

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	<ul style="list-style-type: none"> • The construction of solar panels requires the burning of quartz and coal which also releases carbon dioxide into the air. (https://spectrum.ieee.org/green-tech/solar/solar-energy-isnt-always-as-green-as-you-think). • Batteries increase the carbon footprint. (https://ucsdnews.ucsd.edu/feature/switching-to-a-home-battery-wont-help-save-the-world-from-climate-change). • Solar panels degrade over time and can become a waste issue. (https://www.greenbiz.com/article/what-will-happen-solar-panels-after-their-useful-lives-are-over) • Tesla’s electric cars use lithium, which relies on toxic mining, and aluminum, which uses eight times more energy than steel. (https://www.salon.com/2019/06/17/lithium-mining-for-green-electric-cars-is-leaving-a-stain-on-the-planet/). • Solar arrays have wiped out precious irreplaceable desert flora. 	

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	<p style="text-align: center;">https://psmag.com/environment/what-are-the-downsides-to-renewable-energy).</p>	
048.06	Please extend the use of the AES plant until 2023.	Please see Master Response 2.1.
049.01	I support the AES request to keep its powerplant in Redondo Beach open for the next three years.	Please see Master Response 2.1.
049.02	<p>Parks and open space are hard to come by. The city can't afford to buy property in a community where tear-downs are going for over \$1 million and no private property owner is interested in sacrificing precious square-footage that could otherwise be used to bring in money simply to create a park to benefit the public.</p> <p>Because of this, it is important for the City of Redondo Beach to grab the offer that is currently on the table at the AES site. The property owner, who recently bought the site, has indicated that he will save half the land as open space and will secure \$14 million from AES to clean up the property as long as the State Water Resources Control Board enables the plant to operate for an additional three years.</p>	Please see Master Response 2.1.

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049.03	The environmental impacts of limited operation of the plant are minimal, but the chance to create 25 acres of new public open space is priceless.	Please see Master Responses 2.1, 2.3 and 2.5.
049.04	I hope you will support the proposed three-year extension of operations at the plant.	Please see Master Response 2.1.
050.01	<p>Please consider extending the operations of the AES power plant through 2023. The extension is the fastest and surest way to make sure the plant is retired and the site is redeveloped into something positive for our community.</p> <p>Without the extension we will have no guarantee that anything but the minimum amount of land will be used as open space and, further, we will have no funding set aside to prepare the property to be redeveloped. Simply closing the plant without funding and without a plan that saves half of the site as open space is short-sighted.</p> <p>We may never get this change again, so I hope the board will vote in favor of the extension.</p>	Please see Master Response 2.1.
051.01	I have been in the contracting and engineering field for over thirty years. I am a past president of the Institute of Heating and Air Conditioning Industries and have lived and worked in California for most of	Please see Master Response 2.1.

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	my life. I am writing today to ask the board to support a three-year extension of the AES power plant in Redondo Beach.	
051.02	Energy reliability is critical for Southern California. Though the AES plant does not provide power to Redondo Beach, it plays an important role in making sure there is emergency energy supply throughout the region when usage peaks over the summer and wildfires force black and brown outs. The COVID-19 situation has limited the speed at which alternative power sources are coming online. Renewable energy projects have been stalled and demand is only increasing, so it would be smart for the state to maintain every possible option when it comes to energy production.	Please see Master Response 2.2.
051.03	AES only operates at about 3% of capacity, so its environmental impacts are minimal. Keeping it open for another three years would create an emergency option at a time when no one knows what the future of California’s energy situation holds.	Comment noted. Please see Master Responses 2.2, 2.3, and 2.5.
051.04	Please support the AES extension.	Please see Master Responses 2.1 and 2.2.
052.01	As a lifelong Redondo Beach resident, I have followed politics in our city for many years, and I know that without guarantees and without funding to	Please see Master Response 2.1.

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	make those guarantees reality, the AES power plant property will flounder and deteriorate for many years.	
052.02	That is why I am writing to encourage you to support the extension of the AES power plant.	Please see Master Response 2.1.
052.03	<p>Because the plant operates at a very low level and its air and water impacts are minimal, three additional years of operation will be a small price to pay for the city to solidify the guarantees that the new property owner has offered.</p> <p>From solidifying half of the site as open space in perpetuity to securing \$14 million in clean-up funding, this deal simply makes sense for everyone.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
052.04	I encourage you to vote in support of the three-year extension.	Please see Master Response 2.1.
053.01	I'm writing to ask you to extend the time for the AES powerplant in Redondo Beach.	Please see Master Response 2.1.
053.02	I believe the state is closing too many of these and we will be having an excess of power outages in the summer months. Ideally, we build more gas fired powerplants but I doubt that will happen any time soon.	Please see Master Response 2.2.

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053.03	I know and I'm sure you do too, we can not supply instant power with wind & solar all the time so let's keep this plant open for as long as possible.	Please see Master Response 2.2.
053.04	As the saying goes on the U.S.S Enterprise, More power Scotty.	Comment noted.
054.01	I am writing to encourage you to approve the waiver to permit the AES power plant to operate an additional three years.	Please see Master Response 2.1.
054.02	My wife and I have lived in Redondo Beach for 20 years. I've been impressed with the passion and organizing power of what some would call the anti-growth movement in the city. However, I believe that the time has come to recognize that what that movement wants is incompatible with what makes economic sense. I get the feeling that the movement will continue to use the courts and administrative agencies such as you to impose, in effect, eminent domain without coming up with the funds to finance their desires.	Comment noted.
054.03	I agree with the movement that it would be nice to have an expansive park. I also agree it would be nice if I had an expensive retirement home in Hawaii, but I don't have the money. The City turned its back on an agreement with Center Cal to	Comment noted. Please see Master Response 2.1.

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	<p>revitalize a crumbling infrastructure in the Redondo Harbor. Now it is turning its back on a deal to rid itself of a facility they despise. They don't have, and won't have, the funds to implement their dreams. In fact, if they got their park, they would have to endure the additional burden of maintenance...which would compete with the unfunded pension burden that looms.</p>	
054.04	<p>Had our forebears taken the same approach, Redondo Beach would still have horse and buggy streets and steam locomotive train service. And perhaps even a tax revenue-providing buggy whip factory.</p>	<p>Comment noted.</p>
054.05	<p>It's time to help the movement compromise. Approve the waiver extension request.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>
055.01	<p>I am writing in support of keeping the AES power plant in Redondo Beach thru 2023.</p>	<p>Please see Master Response 2.1.</p>
055.02	<p>After the COVID crisis, our city will be scrambling for every dollar and I fear the AES power plant site will sit format for years before the site is re-envisioned and turned into something great. We need millions of dollars that would come with the extension to clean up the site and get it ready for redevelopment.</p>	<p>Please see Master Response 2.1.</p>

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055.03	Please support the extension.	Please see Master Response 2.1 and 2.2.
056.01	I lived on the Esplanade for many years and I still spend a lot of time in Redondo Beach. I have always looked forward to the day when the AES shuts down.	Comment noted.
056.02	However, it makes no sense to shut it down without a plan to redevelop the site—especially since Redondo doesn't have the money to do even the initial cleanup of the site. Shutting the plant at the end of the year would doom Redondo to years of a decaying industrial plant,	Please see Master Response 2.1.
056.03	When we could instead have both the funding for cleanup and a firm agreement to save half the property as open space. I support a three-year extension for the plant that includes December 31,2023 as a certain retirement date and take advantage of the guarantee from the new property owner to save 25 acres as open space.	Please see Master Response 2.1.
057.01	<p>The issue of the AES Power Plant is all about money –but not in the way you might think.</p> <p>It's about the money the city doesn't have to turn the property into a park. It's about the money that it will take to clean up the site that has been used as an</p>	Please see Master Responses 2.1.

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	<p>industrial site for a century. It's about the money the new property owner can get by continuing to use the site for an industrial use (which is completely permitted under the current zoning).</p> <p>Extending the plant's operations for an additional three years will guarantee half the site will remain open space, provide millions for site clean-up and give us a head start on redeveloping the property.</p>	
057.02	Let's not be short-sighted. Please approve the three-year extension.	Please see Master Response 2.1.
058.01	I am writing to express my support for a three-year extension at the AES power plant.	Please see Master Response 2.1.
058.02	<p>As a two-term member and former chairman of the Redondo Beach Harbor Commission, I agree enthusiastically there should be a timeline for demolition, clean up and development of the AES site. The best way to make sure that timeline truly holds and that funding is available for the next phase of the project is to approve the extension and the binding agreement that needs to come out of it.</p> <p>Nothing is guaranteed to happen at the site if there is no plan and timeline for the property's future. Three more years of operation would allow AES and</p>	Comment noted. Please see Master Response 2.1.

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	the property's new owner to formulate a plan that satisfies the community's need to know what the future holds for that property.	
058.03	A non-functioning power plant that could remain abandoned indefinitely would serve no one's interests, with the possible exception of the new owner. It is imaginable that the buyer could leave the property in its current state (albeit without power generation) and leverage the community's distaste for the power plant into an opportunity to re-sell it at a profit, without changing anything.	Comment noted. Please see Master Response 2.1.
058.04	Allowing AES to continue generating power helps to serve the growing need for electricity in California. Even though the people of Redondo Beach and surrounding communities don't want a power plant beside their beach, the ability to generate electricity is a valuable resource that should not be left idle while political and special interest groups put their self-interests above those of the people.	Please see Master Responses 2.1 and 2.2.
058.05	An extension should force the new owner to present a plan for funding cleanup of the site and future development, important details of the plant's future, which have not been presented to the community. At present, there remains no guarantee what the site will become. The new owner has yet to prepare	Please see Master Response 2.1.

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	a binding agreement that would include a guarantee 25 of the 51 acres will be preserved as open space.	
058.06	The people have spoken. The power plant doesn't fit the community around it. However, it could be there for decades to come if we do not secure commitments now. Being against something is easy. Having a plan and executing that plan is hard, very hard. But you can make the first step possible.	Comment noted. Please see Master Response 2.1.
058.07	Please support the three-year extension and start Redondo Beach on its way to redeveloping the AES site in a way that will benefit a community whose patience has been tried by decades of debate over what to do with the site.	Please see Master Response 2.1.
058.08	Approving the three year extension will enable Redondo Beach leadership to demand a detailed plan that includes penalties for non-performance. That is the only way to begin a process that will make Redondo Beach and neighboring communities whole.	Please see Master Response 2.1.
059.01	For more than 30 years, I have been a real estate professional in Redondo Beach, and I am writing to you to ask you to support a three-year extension for the AES power plant in Redondo Beach.	Please see Master Response 2.1.

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059.02	<p>Founded in 1964, my family’s brokerage firm has seen this city grow and change in many ways. During that time, one constant has been the AES power plant.</p> <p>There has been much talk about when the power plant would eventually shut down and even more about what would replace it when it finally does close its doors.</p>	Comment noted.
059.03	<p>While the plant is scheduled to close at the end of this year, extending its operation through 2023 would yield some important benefits:</p> <ul style="list-style-type: none"> • A guarantee that half the space would be used solely as open space – forever • A guarantee that AES would provide \$14 million to clean up the site and get it ready for a redevelopment effort to be approved by voters • A guaranteed plant retirement date of December 31, 2023 	Please see Master Response 2.1.
059.04	At a time when our politicians often wrangle over even the smallest development, it is important to lock in new open space while the opportunity exists.	Comment noted. Please see Master Response 2.1.

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	<p>No one wants to see a 20-year fight over the site while it deteriorates before our eyes. At the same time, our mayor has said the city expects to be dealing with an \$11 million deficit over the next fiscal year due to the coronavirus shutdown. Securing the funding necessary for cleaning up the plant now could be our best and only way to make sure the site is, in fact, cleaned up properly.</p>	
059.05	<p>For all of these reasons, I urge you to support the proposed three-year extension.</p>	<p>Please see Master Response 2.1.</p>
060.01	<p>Please think about the consequences of your vote regarding the extension of operations at the AES power plant.</p>	<p>Comment noted. Please see Master Response 2.1.</p>
060.02	<p>The easy and obvious strategy would be to shut down the plant as quickly as possible. But doing so would doom our city to years and years of searching for the money at a time of great financial hardship and to redevelop the site and create uncertainty about what the site would become.</p>	<p>Please see Master Response 2.1.</p>
060.03	<p>By being more pragmatic and looking at the long-term view, you can see that keeping the plant open just three more years will have a profound impact on the future of this important coastal area. The three-year extension will protect half the site as open</p>	<p>Please see Master Response 2.1.</p>

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	space. The three-year extension will guarantee millions of dollars to be used solely for cleaning up the site. The three-year extension will provide time for the city and the property owner to work with neighbors to come up with a real and meaningful way to redevelop the site.	
060.04	Please don't take the easy way out. Please think of our city's future. Please support the extension.	Please see Master Response 2.1.
061.01	I urge the Water Board to grant a three-year extension for the AES power plant and allow it to continue operations until December 31, 2023.	Please see Master Response 2.1.
061.02	<p>I cannot wait until the unsightly powerlines are down and the power plant site can be restored into something our entire city can benefit from. But in order to do that we need to guarantee that we have the funding necessary to clean-up the site and begin removing the power lines. We also need to guarantee that the property owner is willing to save at least a portion of the site for use as open space rather than push to build on every square inch of the property.</p> <p>Fortunately, continued operation of the plant for just three more years will provide \$14 million for clean-</p>	Please see Master Response 2.1.

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	up expenses and set aside 25 acres of the site for use as permanent open space.	
061.03	<p>It seems odd to say that keeping the plant running will help it shut down and be redeveloped faster, but that is exactly the case.</p> <p>I hope you will look to the future and do what is right for Redondo. Please keep the plant running through 2023.</p>	Please see Master Response 2.1.
062.01	I support the full three year extension of the AES power plant.	Please see Master Response 2.1.
062.02	I live in Westchester, but my family lives in Redondo Beach and I am on the Esplanade and in King Harbor all the time. I have closely followed what's been happening with the power plant since Heart The City in/around 2000. Nothing has happened for 20 years and my great fear is nothing will happen for another 20 years.	Comment noted.
062.03	I believe a critical step to finally tearing down the power plan is you voting to extend the operation of the plant for three years. This will help Redondo Beach clean up the property once the plant is retired	Please see Master Response 2.1.

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	and make sure that half the land will be preserved as open space forever.	
062.04	Just closing it with no plan for the future and no money to clean up the site makes no sense.	Please see Master Response 2.1.
062.05	Please support the three-year extension.	Please see Master Response 2.1.
063.01	I am writing to ask the Water Board to grant a three-year extension for the AES power plant and allow the plant to continue its operations until December 31, 2023.	Please see Master Response 2.1.
063.02	It will be a great day when the ugly powerlines are down and the power plant site can be redeveloped into something that benefits our city. However, in order to make that happen, we need to guarantee that we have the money necessary to clean-up the polluted land and begin removing the power lines. It is also important that we take the property owner up on his offer to save at least half the land for use as open space.	Please see Master Response 2.1.
063.03	Without such an agreement, we have no guarantee that the property owner will keep from proposing a development that covers on the entire site.	Please see Master Response 2.1.

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063.04	Continued operation of the plant for just three more years will provide \$14 million for clean-up expenses and set aside 25 acres of the site for use as permanent open space.	Please see Master Response 2.1.
063.05	Please vote to support the three-year extension – it is our best chance to turn the property into something positive as soon as possible.	Please see Master Response 2.1.
064.01	Redondo Beach's AES power plant must remain operational another three years.	Please see Master Responses 2.1 and 2.2.
064.02	Ensuring sufficient energy remains a paramount California issue. Heightened priority occurred recently when water distribution rights altered, which resulted in reduced CA hydro electricity capacities. A tremendous result occurs by keeping the AES power plant open another three years. California receives enhanced energy resources.	Comment noted. Please see Master Response 2.2. The meaning of “enhanced energy resources” is unclear and therefore not responded to.
064.03	<p>The new owner of the AES property will possess resources to eventually fund a much more meaningful environmental clean up.</p> <p>The result leads to the possibility of AES's new owner allowing Redondo Beach to purchasing a substantially higher amount of land, and create</p>	Please see Master Response 2.1.

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	meaningful, additional open space, anywhere from five to 20 acres.	
064.04	The California Water Resources Board possesses must permit the AES power plant to remain in operation.	Please see Master Responses 2.1 and 2.2.
065.01	I have lived in Redondo Beach for 37 years, raised 2 children here. I'd love the AES plant to come down too and I am for balanced development.	Comment noted. Please see Master Response 2.1.
065.02	<p>However, if we allow the AES plant to stay for three years, the developer will get more money to restore the site, and the developer will allocate the most acreage to open space – plus he will have more time to effectively develop his plans and go through the public process.</p> <p>The additional time also allows for adequate time to pull the plant down and provides the City with tax revenue during the 3 years.</p>	Comment noted. Please see Master Response 2.1.
065.03	If we push the closure of the plant like some are suggesting, we'd have a disgruntled developer with diminished incentive to give the City and its residents a worthy proposal.	Comment noted. Please see Master Response 2.1.
065.04	I don't buy the pollution and particulate argument - the plant operates at such a low capacity I can't	Comment noted. Please see Master Response 2.5.

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	believe it really is a factor. This is not to say I don't care about air quality - my daughter has exercise-induced asthma and fought hard to play soccer -she was a 4-year letter winner at Redondo Union HS and went on to play Div 1 soccer in college.	
065.05	The NIMBY-ism that has grown in RB has left us with a City no developer wants to work with. Pushing closure of AES before 2023 years will only exacerbate the situation. I urge you to drive around Redondo (particularly South Redondo) and look at all the commercial properties and buildings that lay dormant. Now, with Covid-19, we need a longer-term vision for development and rejuvenation of this City, not a knee jerk reaction to activists that think pulling down the plant (this year) is a win.	Comment noted.
065.06	Believe me, I don't like that monstrosity either, but think about the ENTIRE picture, please. I hope you will support the proposed three-year extension.	Please see Master Response 2.1.
066.01	I am a Redondo Beach resident. Please note I fully support AES continuing their power business in Redondo Beach for the next 3 years.	Please see Master Response 2.1.

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066.02	Considering the Covid crisis now is not the time to take away utilities who maintain power supply during evening hours.	Please see Master Response 2.2.
066.03	In the future when our green energy is further advanced then I can understand the desire to cutback on their emissions. But now is not the time to do so.	Please see Master Responses 2.2 and 2.5.
066.04	Please keep the plant open.	Please see Master Responses 2.1 and 2.2.
067.01	Please support the proposed extension of operations for the AES power plant in Redondo Beach.	Please see Master Response 2.1.
067.02	<p>The extension will accomplish three important goals for our city and out region:</p> <ol style="list-style-type: none"> 1. It will guarantee \$14 million for clean-up of the AES site and the engineering required to remove the ugly overhead power lines. 2. It will protect 25 acres of the site as permanent open space once the plant is retired and the buildings come down. 3. It will provide three additional years of emergency energy production that will 	Please see Master Responses 2.1 and 2.2.

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	enhance power reliability for the Southern California region.	
067.03	The plant operates at a very low level and its air and water impacts are minimal, but the three-year extension will accomplish three goals that cannot be accomplished in any other way.	Please see Master Responses 2.1, 2.3, and 2.5.
067.04	Please vote in support of the three-year extension.	Please see Master Response 2.1.
067.05	This whole thing has gone on way too long and let's just proceed with this and then we have what we have always wanted.	Comment noted. Please see Master Response 2.1.
068.01	I am writing regarding the Once-Through Cooling Policy Amendment and to ask you to support a three-year extension of operations for the AES power plant in Redondo Beach.	Please see Master Response 2.1.
068.02	I live less than two miles from the AES plant, and while everyone in my neighborhood is anxious to see the plant retired, we are also practical and understand that shutting down the plant without an achievable plan for the property means trading one problem for another. No one wants to watch for decades as that site falls into disrepair as the city scrambles to find a plan and the funding to redevelop it.	Please see Master Response 2.1.

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068.03	A three-year extension would provide the funding and the framework for cleaning up the property. It would also ensure that half the site would remain as open space, something that we should lock in while the offer is available.	Please see Master Response 2.1.
068.04	I hope you will support the extension.	Please see Master Response 2.1.
069.01	I was born and raised in the Torrance and throughout my travels in life, I will always call the South Bay home. I support a three-year extension of operations at the Redondo Beach power plant.	Please see Master Response 2.1.
069.02	<p>Being that the South Bay is my home and am hoping to start and family and raise them here, too; I am very concerned about the future of our community.</p> <p>That future includes the opportunity for us to have a park and open space at the AES property – but only if there is funding and a mechanism to make sure that happens.</p>	Comment noted. Please see Master Response 2.1.
069.03	Anyone who thinks that the property owner is going to gift the land to the city for a park or create a park on his own without somehow generating revenue from the site is simply naïve.	Comment noted. Please see Master Response 2.1.

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069.04	In order for us to save that property as a park, we need to find a way to pay for the clean-up of the power plant site and get some sort of guarantee from the property owner that at least some of the site will be used for open space. In fact, that is exactly what the property owner has offered. I know some people who are opposed to the extension because it means that the plant will generate millions of dollars in revenue for the property owner, but that is precisely the point. That revenue is what makes it possible for us to get 25 acres of open space forever and millions of dollars that can be used to clean up the property.	Please see Master Response 2.1.
069.05	I look forward to using that open space one day when I have children. My biggest fear is that we will close the plant without a plan, and I will spend my lifetime staring at a decaying industrial site with no open space and no benefit to our city.	Comment noted. Please see Master Response 2.1.
069.06	Please support the extension.	Please see Master Response 2.1.
070.01	I hope you will join me in supporting a three-year extension for the AES powerplant in Redondo Beach.	Please see Master Response 2.1.

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070.02	Such an extension would enable us to turn 25 acres of the existing site into public open space.	Please see Master Response 2.1.
070.03	Without the extension, it's guaranteed to be developed into an industrial use or worse, sit decaying for decades while the city and the property owner argue over what should go there.	Please see Master Response 2.1.
070.04	I'm not a pollution fan, but the plant operates at such a minimal level; there are very few emissions. Emissions from the cars that pass on PCH every day exceed the emissions from the plant itself.	Please see Master Response 2.5.
070.05	Delaying the closure of the plant for three years is definitely worth the opportunity to create so much new open space in Redondo. Creating open space doesn't happen every day and I think we should jump at this chance while we can.	Please see Master Response 2.1.
070.06	Thank you for extending the operations of the plant.	Please see Master Response 2.1 and 2.2.
071.01	I'm contacting you to communicate my support for the AES power plant in Redondo Beach.	Please see Master Response 2.1.
071.02	I definitely understand and support environmental reasons...but this seems to be a no brainer. I've watched the back and forth over this plant for too long. It seems to me there will be no perfect answer	Please see Master Response 2.1.

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	<p>to make everyone happy, but this is life, and that's why we have leaders making tough decisions.</p> <p>Reasonable decisions seem obvious sometimes, as in this case...based on what we all know will happen, or won't happen, if this plant closes as scheduled...weighed against the extension and our community's true and real needs, and this is why I'm writing today.</p>	
071.03	<p>The financial contribution in extending the closure far outweighs any other decision in my opinion, and seems an obvious reasonable choice. Especially in today's crazy, and definitely needy situation.</p>	<p>Please see Master Response 2.1.</p>
071.04	<p>I've lived here for over 25 years...I married a local teacher...who has been largely and deeply connected and woven into this community through friends and relatives for many more. I've started several businesses, and continue to love and support this community.</p> <p>I hope and pray this community moves in reasonable directions for not only my three children, but everyone. And this issue seems to be one of those that will effect the path.</p>	<p>Comment noted. Please see Master Response 2.1.</p>

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071.05	My intent is not to shame or blame, but I'm just simply not sure how any reasonable person or community leader could disagree with this...to the point that it inspired me to communicate on the matter.	Please see Master Responses 2.1 and 2.2.
071.06	I hope you will agree and support the extension.	Please see Master Response 2.1.
072.01	I am writing to you in the hope that you will join me and my neighbors in supporting a three year extension of the operations of the AES power plant in Redondo Beach.	Please see Master Response 2.1.
072.02	I feel the power plant is part of our history and what made us the community we are today. I'm a Redondo Beach small brick and mortar business owner in business since 1990 who also lives in Redondo Beach – born and raised in Hermosa Beach, so I know what a big role this power plant has played in our community. I understand the importance of clean and reliable power. My businesses could not keep the doors open if we were faced with rolling blackouts. During hot weather, I'm tired of having my air conditioning cycled off simply because we still don't have enough available backup power to meet our needs. I'm always worried of the possibility of an earthquake or natural disaster that may impact our available	Please see Master Responses 2.1 and 2.2.

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	<p>power. There are always possibilities of terrorist attacks, equipment malfunction or power line breaks due to fire, lightning, or other reasons where having available backup is always best. Think of all the consequences should we need backup power and the plant were to be shut down. I'm a huge fan of solar and wind power yet understand we don't always have wind, the sun isn't up 24/7, and we often have cloudy days where power is still very much needed. More and more electric cars are on the road along with more computer and home automated systems all requiring more power than ever. We need every available backup power system available for the health and safety of our community. Think of what would happen especially during this Corona crisis where all the food would spoil if the power were to fail. Think of what will take the place of the power plant? I can assure you there would be much more traffic, pollution, and lost views with the amount of people and business driving to the current power plant location. Think of the building and cars coming to all along the Edison power line right of way. That will be a much bigger impact than any backup power plant would have especially since the plant only runs around 3% of the time.</p>	

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Letter and Comment Number	Comment	Response
072.03	Again, please support the proposed three-year extension and protect our entire area.	Please see Master Response 2.1.
072.04	Hello. I wanted you to be aware how special interests groups are placing ads in newspapers with misleading information about the Redondo beach AES Power plant in attempt to get people to write you letters to close down the plant. They lie saying anything to mislead the pubic.	Comment noted. Please see Master Response 2.1.
072.05	So many residents rely on safe and reliable power. People could die during hot weather if power isn't available during emergency as this plant is only for backup.	Please see Master Response 2.2.
072.06	Please keep the plant open for 3 more years to ensure public safety and reliable power at a reasonable price.	Please see Master Response 2.2.
072.07	Supply and demand seems to be a course many have forgotten about.	Please see Master Response 2.2.
073.01	My wife and i would like the AES power plant in Redondo Beach, Ca operation to be extended to December 31,2023 and beyond.	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
073.02	As more and more people buy electric cars and use more electricity, we need maximum capacity of electrical power, not less.	Please see Master Response 2.2.
074.01	I am writing to you in support of a three-year extension of operations for the Redondo Beach power plant.	Please see Master Response 2.1.
074.02	By extending operations for just three more years, we can protect 25 of the 51 acres of the site as permanent open space.	Please see Master Response 2.1.
074.03	<p>That land will never become anything but open space no matter what the new property owner decides to build on the rest of the site. I am tired of the constant battles over development in Redondo Beach, and without the open space agreement, this will be another in a long line of development fights that goes nowhere. This impacts adjoining communities such as mine (I live a block outside the city limits in the Riviera portion of Torrance) by tying up property that should be developed to add to my property value.</p> <p>This could be a park, a wetlands or athletic fields. But without the money the extension will bring in, this land will be nothing more than another</p>	Please see Master Response 2.1.

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	battleground that takes decades to become something useful.	
074.04	I encourage the board to join me in supporting a three-year extension. Thank you.	Please see Master Response 2.1.
075.01	First off, I wouldn't wish Redondo Beach politics upon my worst enemy. Very few Redondo Beach voters vote due to the level of hostilities between development friendly Yes-In-My-Backyard folks and the no-growth, slow growth Not-In-My-Backyard folks: without any hope of mending fences or building bridges. The decision before the State Water Resources Control Board is a difficult one. This wasn't even on my radar screen to write to your board, but Mayor Brand asked Redondo Beach residents to write, so as a resident of Redondo Beach, I am writing.	Please see Master Response 2.1.
075.02	Granted, there are points of agreement, inarguably, power plants do pollute the environment; land, sea, and air, however, this has been a constant in Redondo Beach since the fifties. Since the seventies, the populace in general has grown very intolerant towards power plants, nuclear and gas plants, especially along the coast.	Please see Master Response 2.3 and 2.5.

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075.03	<p>Landowners and developers of power plant sites have been a target of politicians, political action committees, and special interest groups for a very long time, and Redondo Beach is no different. However, in Redondo Beach deep-pocketed landowners and developers in general have not been competitive in local Redondo Beach politics since the nineties. I also think it is slightly disingenuous for State, County, and local officials to be criticizing landowner and developers' advocates-supporters for being "paid" especially, since they themselves are being paid to advocate and support on behalf of local government and their constituents. The scales are already skewed in the favor of government officials, political action committees, and special interest groups; it doesn't need to be tipped even further with such claims. It is already very difficult for landowners and developers to launch campaigns in support of causes under such biased and hostile conditions.</p> <p>Of course, State, County, and local politicians and governmental agencies are jumping on the bandwagon against power plants from functioning at all, period, and standing up against the power plant landowners and developers, because it is an election year and it is red meat for their supporters! My immediate impression from listening to the</p>	Please see Master Response 2.1.

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	<p>comments provided by speakers in your video, is that the City of Redondo Beach did not properly vet a potential buyer for the AES Power Plant, the plans to develop the AES Power Plant site fell through, and now, local politicians, political action committees, and special interest groups are in heavy damage control mode, seeking revenge against the new power plant landowners, rallying Redondo Beach residents to put pressure upon this body The State Water Resources Control Board to shutdown the AES Power Plant once and for all. In my opinion, this is all nothing but a power play, because that is what it takes to circumvent the Will of the Voter and the Law of the Land.</p>	
075.04	<p>So, let's talk about the Will of the Voter and the Law of the Land. In Redondo Beach, the power plant landowners and developers have been trying to tear down the old power plant for over the last twenty years. They have outspent the anti-development forces in ballot measure after ballot measure for the last twenty years and every time a majority of Redondo Beach voters have voted against developing the power plant site: it is this reason, and this reason only that the old power plant is still in operation. The Redondo Beach could have had thousands of new single and family residents on the power plant site and the Redondo Beach voters</p>	<p>Please see Master Response 2.1.</p>

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	<p>voted against the development of the site. Redondo Beach residents could have had more jobs producing commercial development (office, retail, hotel) on the power plant site and the Redondo Beach voters voted against it. Redondo Beach could have had new civic center, an actual downtown Redondo Beach, on the power plant site and the Redondo Beach voters voted against developing the power plant site. Redondo Beach could have had a much smaller, more efficient, power plant to replace the old power plant, and once again the Redondo Beach voters voted against developing the power plant site.</p> <p>For the last twenty years the Redondo Beach voters have been opposed to developing the power plant site, it is this reason and this reason only, that the old power plant has not been torn down. The power plant landowners and developers have been trying to tear down the old power plant for the last twenty years and the Redondo Beach residents have been fighting them from tearing the old power plant down and developing the power plant site, so it is absolutely incontestable, undeniable, indisputable, and undebatable about what the Will of the People is: Redondo Beach voters have spoken very emphatically that they do not want the power plant property to be developed, it is conclusive. This isn't</p>	

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	<p>some Schrodinger’s Cat thought experiment: elections have consequences. The Redondo Beach voters cannot be both opposed to the power plant operating as a utility and in favor of the power plant operating as a utility, at the same time. If the residents of Redondo Beach were truly opposed to the old power plant operating as a utility, then the old power plant would have been torn down decades ago.</p>	
075.05	<p>As a Redondo Beach voter, I personally, voted in favor of Measure G, which zoning provided for the AES power plant site to be used as a power plant and other public utilities (like a desalination plant) uses. Park zoning was permitted on this site, but was not defined or required. Measure G passed overwhelmingly and it is currently the Law of the Land. Nonetheless, I do not know if the State Water Resources Control Board has the power to overturn the Will of the People or circumvent settled law.</p>	<p>Comment noted. Please see Master Response 2.1. Adjustments to local zoning considerations are outside of the State Water Board’s authority.</p>
075.06	<p>In closing, I would like to thank the State Water Resources Control Board and the opportunity to voice my opinion. I hope this body will allow for the land to continue to be used for what the Redondo Beach voters have voted for it to be used for, as a utility.</p>	<p>Please see Master Response 2.1.</p>

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Letter and Comment Number	Comment	Response
076.01	I encourage you to support the extension of operations at the AES Plant in Redondo Beach through 2023.	Please see Master Response 2.1.
076.02	This money will be greatly beneficial to our community, especially with the current COVID-19 situation and our city losing much of its tax revenue. That money is used to pay our police, fire, and the vital operation of the city.	Please see Master Response 2.1.
076.03	I have been in the landscaping business for more than three decades, so I am very aware of how important open space is to a community. Plants and trees clean the air. Open space encourages recreation and healthy living. So, the chance to secure 25 acres of new open space for our community should not be underestimated.	Comment noted. Please see Master Response 2.1.
076.04	When AES sold the power plant property, the new owner agrees to set aside 25 of the 51 acres as open space forever, if the plant could operate for an extra three years this could be revenue that could help with the purchase of the land. This is land that would cost millions for the city at a time when the city is scrambling to find every dollar it can.	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	It seems that running the plant for another three years is totally worth getting all that open space for our community.	
076.05	Please support the extension.	Please see Master Response 2.1 and 2.2.
077.01	I and my family has lived in Hermosa Beach since the mid-1920's. To me the AES Power Plant is that really cool Edison Plant. The Redondo Beach art community has had in the past their annual shows there, amongst the old insanely huge machines and buildings. It would be a perfect set for a Halloween movie at night with the equipment and differing levels, lighting and atmosphere.	Comment noted.
077.02	I am and was against the AES Power Plants closure as there are too few local power plants that will be needed in an emergency. Think quake. My grandparents road out the Long Beach Quake in 1933 with minor damage to their Hermosa Beach home but there were not as many residents/houses back then and I believe the damage today would be much, much worse. If our imported power grid went down then we would only be able to access our local power. We have been told to shelter in place—reasonable as the rest of the 6 million plus people to	Comment noted. Please see Master Responses 2.1 and 2.2.

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	the north, east and south will need to leave before we can.	
077.03	I know that the plant will eventually have to go, but I am for any extension.	Comment noted. Please see Master Responses 2.1 and 2.2.
077.04	I don't have a problem with the power lines or the old buildings. Speaking of which—the world renowned artist, Wyland, painted this famous mural depicting the California Gay Whale migration and may be viewed on the exterior wall of the Southern California Edison Company building. The mural is one of Wyland's largest and most extraordinary works.(https://www.redondo.com/city/wall.html) Really be a cultural shame to lose the Waling Wall.	Comment noted. Please see Master Response 2.1.
078.01	I am writing in support of an extension for the AES power plant	Please see Master Responses 2.1 and 2.2.
078.02	Our coast is beautiful, and I can't wait to access more of it. But if we shut down the plant immediately, there simply will not be enough money to restore the property or any assurances that the land will be anything but another massive development that will bring us more noise, traffic and pollution.	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
078.03	An extension, however, will lock in half of that enormous property as open space FOREVER! It will provide \$14 million in funds to clean up the site after years of ground pollution, and I cannot wait until those ugly power lines are out of sight at King Harbor. With the new open space, more people will be able to take advantage of the new open space.	Please see Master Response 2.1.
078.04	With the new open space, more people will be able to take advantage of the new open space. Please think about the future of King Harbor when making your decision and support the extension.	Please see Master Response 2.1.
079.01	I am writing to express my support the 3-year extension at the AES powerplant.	Please see Master Response 2.1.
079.02	If the Water Board decides to deny the three-year extension, Redondo will be stuck with a defunct power plant that will continue to deteriorate. The overhead power lines will continue to pollute the view corridors across our coastline for another decade or more.	Please see Master Response 2.1.
079.03	Today, we have a chance to ink an agreement that assures that the closure and the tear down of the power plant and an assurance that at least half of the property will be saved as open space forever.	Please see Master Response 2.1.

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079.04	I urge you to think of the residents here in Redondo and the future of this property. Please approve the three-year extension.	Please see Master Response 2.1.
080.01	Redondo Beach has a unique and necessary opportunity to increase the open space along the South Bay coastline. The opportunity is directly tied to the on-going operation of the AES power plant, so I am writing to encourage you to support a three-year extension for the plant, which is currently scheduled to close at the end of this year, 2020.	Please see Master Response 2.1.
080.02	<p>The plant operates at very minimal levels today, but extending its operation would allow the city to get an agreement from the current property owner to save 25 acres as open space for all of us to enjoy. No one wants to see the plant operate any longer than necessary, but this deal is important to us and we need to get this extension done immediately. It would create open space we cannot get any other way.</p> <p>In addition, the deal includes millions of dollars to clean the property and get it ready to be redeveloped. This is very important – we don't want this property to deteriorate after the plant is retired because the city cannot afford to clean it.</p>	Please see Master Responses 2.1 and 2.2.

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	Dealing with three more years of operation is a small price to pay to this open space and get a jump start on redeveloping the site into something that will benefit us all.	
080.03	Please support the three-year extension. Thank you.	Please see Master Response 2.1.
081.01	I am writing in support of an extension for the AES power plant.	Please see Master Response 2.1.
081.02	Our coast is beautiful, and I can't wait to access more of it. But if we shut down the plant immediately, there simply will not be enough money to restore the property or any assurances that the land will be anything but another massive development that will bring us more noise, traffic and pollution.	Please see Master Response 2.1.
081.03	An extension, however, will lock in half of that enormous property as open space FOREVER! It will provide \$14 million in funds to clean up the site after years of ground pollution, and I cannot wait until those ugly power lines are out of sight at King Harbor. With the new open space, more people will be able to take advantage of the new open space.	Please see Master Response 2.1.

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081.04	Please think about the future of King Harbor when making your decision and support the extension.	Please see Master Response 2.1.
082.01	I am hopeful that the AES power plant site will be converted into largely open space for the public to enjoy once the plant is retired, and the best way to make sure that happens in my lifetime is for the Board to approve a three-year extension of operations.	Please see Master Response 2.1.
082.02	By allowing the plant to continue operating at its current rate -just 3% of capacity-AES will commit \$14 million that can be used for site remediation and engineering work to remove the overhead power lines. More importantly, however, the extended operations will trigger an agreement from the new property owner to set aside half the site as open space.	Please see Master Response 2.1.
082.03	Shutting the plant will be great, but shutting it with the money to do something after it is closed is critical. We cannot wish this property into becoming open space, but with the funds from AES and a commitment from the property owner, we can actually make it happen.	Comment noted. Please see Master Response 2.1.
082.04	Please support the three-year extension.	Please see Master Response 2.1.

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083.01	<p>Never before has it been so important to be prepared for an emergency. The crisis we are going through holds so many uncertainties for daily life, and for our energy needs as well. There is no telling what the heat of summer will mean to our energy needs, and it would be prudent for us to support a three-year extension of operations at the Redondo Beach power plant to make sure all possible emergency supplies are available.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>
083.02	<p>Certainly, no one wants to keep their neighborhood power plant going forever. I, too, want to see that site redeveloped, but an operating extension would have several important benefits for both Redondo Beach and all of Southern California.</p> <p>Regionally, keeping the plant operational for an additional three years, operating at no more than 5% of capacity as it does today, would provide us with energy reliability as we determine the impacts of the coronavirus shutdown. No one wants to have to shutter businesses because we have power shortages or cut power to residents when demand is too great. The best thing we can do is be prepared.</p> <p>Locally, the new owner of the plant has issued a guarantee that 25 of the plant’s 51 acres will be protected as open space and amenities if the plant</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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Letter and Comment Number	Comment	Response
	<p>remains operational through 2023. This is critically important in an area where every square inch of open space is highly valued.</p> <p>In addition, if the three-year extension is granted, AES will pay \$14 million for the site’s clean-up expenses and other costs to get it ready for retirement and redevelopment. It is one thing to cross our fingers and hope the power plant could become a park, but with no funding, that is simply a pipe dream. This deal would provide the funds to make sure something actually happens at the site and the plant doesn’t just sit and decay for the next 20 years while the city scrambles to find funding to do something about it.</p> <p>Another three years of plant operations is a small price to pay to make all of this happen.</p>	
083.03	Please vote to support the extension.	Please see Master Response 2.1.
084.01	I support the AES extension and I hope the board will support it as well.	Please see Master Responses 2.1 and 2.2.
084.02	I was born and raised right here on this beautiful beach, a place I call home, and one of the reasons we love Redondo Beach is being outdoors; but it’s clear that our city needs more park space. We’d	Comment noted. Please see Master Response 2.1.

Table 3 – Comment Letters 39 to 99
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	love to see the AES powerplant turned into a park, but there's no way the city can afford to buy that land on its own especially during this COVID crisis.	
084.03	We have to be practical. Fortunately, the owner of the property is willing to dedicate half of the land as open space and obtain \$14 million to clean up the land as long as the plant can operate through 2023. That's a small price to pay for open space that Redondo residents will be able to enjoy for generations to come.	Please see Master Response 2.1.
084.04	Please think about the future and support the extension.	Please see Master Responses 2.1 and 2.2.
085.01	I have been a resident of the South Bay for over 52 years. I believe the Redondo Beach AES power plant should be allowed to continue to be operated to generate electricity.	Please see Master Response 2.2.
085.02	As ratepayers, we can not afford to shoulder the burden of future expenses from building new generation and distribution capacity.	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
085.03	It will be the most cost effective way to deal with increasing demand for power as people move toward electric vehicles.	Comment noted. Please see Master Responses 2.1 and 2.2.
085.04	It is nonsense to move it in order to build more power consuming development in it's very location.	Comment noted. Please see Master Response 2.1.
085.05	As a longtime resident I support the Resources Board's decision to extend the life of this generating facility.	Comment noted. Please see Master Response 2.2.
086.01	Everyone in our community is looking forward to the day when the AES power plant ceases operation. It is an eyesore and we can do better in the middle of King Harbor.	Comment noted.
086.02	However, the reality is that it will take millions to clean up the property and turn it into something beneficial. An extension like the one proposed by AES would generate millions of dollars that would be used to clean up the site and would trigger a binding agreement with the new property owner to protect the site as open space. An extension is our best chance to make sure the old AES site becomes a community benefit once the plant is retired please support the proposed extension.	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
087.01	<p>Extending the operation of the AES plant will help Redondo Beach clean up the property once the plant is retired and make sure that half the land will be preserved as open space forever. Just closing it with no plan for the future and no money to remediate the site makes no sense. Please support the three-year extension.</p>	Please see Master Response 2.1.
088.01	<p>It is critical for our city to secure as much open space as it can. That is why I am writing today to express my support for a three-year extension of operations at the plant.</p>	Please see Master Response 2.1.
088.02	<p>I spent five years in the Navy and am the father of two children, and have owned a business in South Redondo for over five years, so I place a high value on open space in our community. By granting the three-year extension to a plant that has already been operating for more than 100years, you will be helping my family and my neighbors achieve something important to future generations – the creation of new open space that everyone in the public can enjoy.</p> <p>The AES property was recently sold, and the new owner of the site has guaranteed that if the power plant is allowed to continue its minimal operations for another three years, he will assure the city that</p>	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>25 acres of the site will be preserved as open space. So, whether he builds office, retail, industrial, hotel or residential at the site, at least 25 acres of the site will remain open space! No battle. No fight. We would have our bird in the hand and wouldn't have to negotiate down the road and wait decades to know that we could secure this open space.</p> <p>Another three years of plant operations is truly a tiny price to pay if it means Redondo Beach can secure this open space forever. I hope you will agree and vote accordingly.</p>	
089.01	<p>It is time to retire the AES power plant and allow the opportunity for repurposing of this 50-acre ocean-front property. Residents are tired of the eye sore, the loud noises, the awful smells, the plumes that billow from its giant smokestacks, and the negative effect on local marine life. Allow the plant to retire in December 2020 as you promised and we have been expecting for a decade.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
090.01	<p>I strongly oppose the extension of the Redondo Beach AES Power Plant extension for the following reasons:</p> <ul style="list-style-type: none"> • The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, 	Please see Master Response 2.1.

Table 3 – Comment Letters 39 to 99
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <ul style="list-style-type: none"> • Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES. • The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then. 	
090.02	<ul style="list-style-type: none"> • There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. • There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses. 	Please see Master Responses 2.1, 2.3, and 2.5.

Table 3 – Comment Letters 39 to 99
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<ul style="list-style-type: none"> • The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. 	
090.03	<ul style="list-style-type: none"> • A previous health impact study conducted by the City of Hermosa Beach found-even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. • According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. • It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit. 	Comment noted. Please see Master Response 2.5.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
090.04	<ul style="list-style-type: none"> • A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa. 	Comment noted. Please see Master Responses 2.1 and 2.4.
090.05	<ul style="list-style-type: none"> • This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon. 	Please see Master Responses 2.1 and 2.4.
090.06	<ul style="list-style-type: none"> • Retiring the AES plant and restoring coastal wetlands will also improve oceanwater quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna. 	Please see Master Response 2.3.
090.07	<ul style="list-style-type: none"> • They are already, unexpectedly extending the retirement date of three other large power 	Comment noted. Please see Master Response 2.2.

Table 3 – Comment Letters 39 to 99
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	plants in this area. We don't need AES Redondo for grid reliability.	
090.08	<ul style="list-style-type: none"> As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs. 	Comment noted. Please see Master Response 2.2.
091.01	<p>It would be great to move forward from the AES Plant. CLOSE IT DOWN PLEASE!</p> <p>My understanding is that by sending this email I am voicing along with my fellow neighbors and residents when we drive by that massive archaic looking plant "What the hell is that thing" and wondering why we still have a gas powered power plant running 2020 when I am powering my home through solar and Tesla batteries. Not to mention the environmental impact on our 3 young children by keeping a plant like that open.</p>	Please see Master Responses 2.1, 2.2, and 2.5.
091.02	I read the plant was built in 1950, back then only a few people had refrigerators...in 1950 Harry Truman was president.	Comment noted.
091.03	We welcome the day in the very near future when the plant comes down along with the associated eye	Comment noted.

Table 3 – Comment Letters 39 to 99
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Letter and Comment Number	Comment	Response
	sores that so many people that live in Redondo question every day “wait they still use technology like that”	
092.01	I am a resident of Redondo Beach and would like to request that the life of the AES power plant not be extended beyond December.	Please see Master Responses 2.1 and 2.2.
093.01	Our family along with the City of Hermosa Beach, City of Redondo Beach, the School boards of both Redondo Beach and Hermosa Beach, and the Beach Cities Health District are all unanimously opposed to any extension of operations of the outdated, gas fired, once through AES Redondo power plant. The plant is scheduled to cease operations 12/31/2020 and we ask that you ensure that operations cease then.	Comment noted. Please see Master Responses 2.1 and 2.2.
093.02	We have strong concerns about our health from the local air pollution and carbon emissions from the ancient units. Previous studies have shown that the AES power plant was the largest source of fine particulate pollution in the area. Not only do the particulates cause asthma in our children, the American Cancer Society and the California Air Resources Board have both stated that exposure to	Comment noted. Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	fine particulate emissions cause a high number of deaths.	
093.03	As local residents we are anxious to see the retirement of the AES plant as soon as possible so the coastal wetlands that are a part of that property can be restored.	Comment noted. Please see Master Responses 2.1 and 2.4.
093.04	Retiring the AES plant and restoring coastal wetlands will improve ocean water quality, help protect marine life and provide needed habitat for migrating birds.	Comment noted. Please see Master Responses 2.3 and 2.4.
093.05	The electricity generated by the AES power plant is not essential to the electricity needs in California	Please see Master Response 2.2.
093.06	It runs only a few days per year and on those days it creates enormous clouds of polluting soot and fine particulates.	Please see Master Responses 2.2 and 2.5. Additionally, see revisions in Section 5.2 of the Staff Report regarding peaker operations and their role in grid reliability.
093.07	Our family adamantly requests that your board does not permit the extension of operation for the AES Redondo Beach power plant beyond 12/31/2020.	Comment noted. Please see Master Response 2.1.
094.01	Please do not extend the operation of the AES powerplant. We know it is scheduled to be taken	Please see Master Response 2.1.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	down December 2020 - let's keep this date! and keep to the promise.	
094.02	There is so much parkland waiting to be used for Redondo Beach and Hermosa Beach residents. This is especially relevant to Redondo Beach residents who are considered park-poor - in the beautiful state of California, residents should have access to as much parkland as everyone else in this country.	Comment noted.
095.01	I feel that the AES Redondo power plant is an inefficient gas-fired, 1950's generation station, that is not fit to support our great community. I demand that you please shut down this plant by the end of December 2020.	Please see Master Responses 2.1 and 2.2.
096.01	Please do not extend the operation of the AES plant in Redondo Beach beyond December 31, 2020.Thank you.	Please see Master Response 2.1.
097.01	I am very disturbed that you are considering allowing the AES Redondo Power Plant to be extended beyond Dec 2020. This power station needs to be closed down. We need our coastline back, we need to stop the in take of water from the bay to be closed forever.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.3.

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Letter and Comment Number	Comment	Response
	<p>It is time to move forward with cleaner power that makes our beaches clean and nice.</p> <p>So please please stop this extension happening</p>	
098.01	Please do NOT vote to extend the retirement of the AES power plant in redondo.	Please see Master Responses 2.1 and 2.2.
098.02	<p>This has been polluting our airs for too long and it is time for it to get taken care of. A health impact study conducted by the City of Hermosa Beach found that even at 5% production the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. This concerns me for the health of the community and my family.</p>	Comment noted. Please see Master Response 2.5.
099.01	The time to end the blight is now. Do not extend the life term of the AES Power Plant	Please see Master Response 2.1.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
100.01	The health and beauty of the marine environment in Santa Monica Bay is of special concern to me.	Comment noted.
100.02	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Please see Master Responses 2.1 and 2.2.
100.03	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Comment noted. Please see Master Response 2.3.
100.04	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	Comment noted. Please see Master Responses 2.1 and 2.4. Additionally, see revisions in Section 2.5 of the Staff Report with updated information on the wetlands at Redondo Beach and the retention of Prop 68 funding by the City of Redondo Beach.

Table 4 – Comment Letters 100 to 199
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works.</p>	
100.05	<p>Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	<p>Please see Master Responses 2.1, 2.3 and 2.4.</p>
100.06	<p>The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”</p>	<p>Comment noted. Please see Master Response 2.4.</p>
100.07	<p>And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.</p> <p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of</p>	<p>Comment noted. Please see Master Response 2.2.</p> <p>Uncertainty regarding grid reliability was taken into account by the SACCWIS in its adoption of the January 2020 SACCWIS Report.</p>

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p>	
100.08	<p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly deserving of retirement to allow the park and restoration plans to proceed apace.</p>	Please see Master Responses 2.1 and 2.2.
101.01	<p>The health and beauty of the marine environment in Santa Monica Bay is of special concern to me.</p>	Comment noted. Please see Master Response 2.3.
101.02	<p>I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p>	Comment noted. Please see Master Response 2.1.
101.03	<p>Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more</p>	Please see Master Response 2.3.

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	OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	
101.04	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	Please see Master Responses 2.1 and 2.4.
101.05	The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.	Please see Master Responses 2.1, 2.3, and 2.4.
101.06	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Response 2.4.
101.07	And the Public Utilities Commission concedes that its	Please see Master Response 2.2.

Table 4 – Comment Letters 100 to 199
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Letter and Comment Number	Comment	Response
	<p>concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.</p> <p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state's economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p>	
101.08	Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.	Please see Master Responses 2.1 and 2.2.
101.09	Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace."	Please see Master Response 2.1.
102.01	<p>I implore the Board to reject the AES power plant permit extension for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously</p>	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p>	
102.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
102.03	<p>A previous health impact study conducted by the City of Hermosa Beach found—even at 5% production—the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p>	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
102.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa</p>	Please see Master Response 2.1.
102.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1, 2.2, 2.4, and 2.5.
102.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna</p>	Please see Master Responses 2.3 and 2.4

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Letter and Comment Number	Comment	Response
102.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability	Please see Master Response 2.2.
102.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
103.01	Please do NOT extend the operational license. NO ONE I know who lives here wants it extended.	Comment noted. Please see Master Response 2.1.
104.01	I'm emailing to protest for the oil refinery to get taken down. With COVID-19 happening, it has allowed the earth to breathe from many cars, factories and pollutants. If we can stop the oil refinery and turn it into something productive, ie a park, taking down the refinery is not only impacting the earths pollution, it will help keep people living around the area safe and protected!	Comment noted. Please see Master Responses 2.1, 2.2, 2.4, and 2.5. Furthermore, the Amendment propose compliance date extension for power generating facilities, not oil refineries.
105.01	<p>I oppose the Redondo Beach AES extension based on the following key points:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed</p>	Comment noted. Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
105.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
105.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the</p>	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
105.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Response 2.1.
105.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1, 2.2, 2.4 and 2.5.
105.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Please see Master Responses 2.3 and 2.4.
105.07	<p>They are already, unexpectedly extending the retirement date of three other large power plants in this area. We</p>	Please see Master Response 2.2.

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	don't need AES Redondo for grid reliability.	
105.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
106.01	It was the correct decision when California's State Water Resources Control Board ordered coastal power plants to either shut down or stop using ocean water for cooling, which kills fish and harms marine life.	Please see Master Response 2.1 and 2.3.
106.02	That was ten (10!) years ago, but now, the owners are looking to flaunt the ruling and extend the life of this harmful plant, and keep it going for several more years to come	Please see Master Response 2.1 and 2.2.
106.03	The Cities of Hermosa and Redondo Beach, as well as the Beach Cities Health District, Heal the Bay and the Surfrider Foundations are all opposed to any extension of the outdated, gas-fired generator at the AES plant.	Please see Master Response 2.1.
106.04	<p>The aging units at the AES plant are of great concern for their adverse affect on the residents of Redondo/Hermosa, and the surrounding communities. Air pollution and carbon emissions are two prime problems for the 21,000 residents living within one mile of the plant.</p> <p>According to the California Air Resources Board and American Cancer Society, fine particulate emissions kill</p>	Comment noted. Please see Master Responses 2.1 and 2.5.

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	twice the number of people who die from breast cancer in this state. And the Hermosa health impact study found that AES was the largest non-vehicular source of particulate pollution in this area	
106.05	The retirement date of three other large plants in this area have already been extended; AES Redondo is unnecessary for grid reliability and production.	Please see Master Response 2.2.
106.06	The State is facing an excess of power, some 20% more than needed, according to the LA Times.	Please see Master Response 2.2
106.07	AES and its new private owner have suddenly decided they'd prefer to benefit financially, rather than do the right thing, which is to follow the the 2010 ruling, and shut down the AES plant! South Bay residents should not be put at danger, just to fill the pockets of this new developer.	Please see Master Responses 2.1.
106.08	<p>Redondo Beach should be able to continue their hard work (along with the State and County) towards maximizing the open space, and encourage wetlands restoration that will also help improve ocean water quality, protect marine life, and provide much-needed habitat for migrating birds.</p> <p>Local residents have continuously expressed their opposition to the AES facility remaining open; noise, air pollution as well as damage to marine life make it a plant that should be shut down, THIS YEAR!</p>	Please see Master Responses 2.1, 2.3, and 2.4, and 2.5.

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106.09	Thank you for deciding in favor of the health of California residents.	Comment noted. Please see Master Response 2.1 and 2.2.
107.01	<p>I'd like to add my voice to those supporting the closing of the AES power plant in Redondo Beach.</p> <p>First, the plant is neither needed nor is it wanted by the local citizenry who are impacted daily by its operation.</p>	Please see Master Responses 2.1 and 2.2.
107.02	First, in a 2010 report by the California Air Resources Board and California Energy Commission it was clearly shown that that the Redondo Beach power plant is not needed because, among other things, this plant really produces less than 1 percent of California's power needs.	Please see Master Response 2.2.
107.03	Second, there is the incredible amount of noise, air, and landscape pollution created by this plant. This severely impacts those of us who live just under a mile away from the plant, a number of whom suffer from asthma and other breathing issues.	Comment noted. Please see Master Responses 2.1 and 2.5.
107.04	Third, do we really want AES to continue to kill even more sea life – which it is doing now under its operating procedures?	Please see Master Responses 2.2 and 2.3.
107.05	Finally, again and again when put to a vote, the public rejected continuation of this plant. We now have a once-in-a-lifetime opportunity to leave a legacy of more open space, some parkland, and clearly a cleaner air future in a	Please see Master Responses 2.1 and 2.2.

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	<p>more livable community.</p> <p>Please put an end to the plant's operation.</p>	
108.01	<p>Please, PLEASE close the AES Redondo beach power plant ASAP. We are tired of the plant's loud noises, its thick black smoke, and most importantly, the air contaminants emissions that cause lung illness.</p>	<p>Please see Master Responses 2.1 and 2.5.</p>
109.01	<p>My family vehemently opposed the proposed extension of the AES power plant in Redondo Beach, CA for the safety of our community and environment.</p>	<p>Please see Master Response 2.1.</p>
110.01	<p>I am writing to urge you to protect our climate and marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago.</p>	<p>Please see Master Responses 2.1 and 2.3.</p>
110.02	<p>The Alamitos (Long Beach) and Huntington Beach facilities have largely been replaced already. At Alamitos, three of six units have already been taken offline. At Huntington Beach three of four have been decommissioned. The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018.</p> <p>With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants for grid</p>	<p>Please see Master Response 2.2.</p>

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	reliability will be reduced even further.	
110.03	Besides the damage to marine life, these plants damage public health and contribute to climate change. We need a just transition away from fossil fuels and that should begin by replacing these polluting power plants with power from renewable sources.	Please see Master Responses 2.1, 2.2, 2.3 and 2.5.
111.01	I am requesting you please reject extending operations at the AES Redondo Beach power plant.	Please see Master Response 2.1.
111.02	We have been living with air pollution from this plant for decades - and the particles we breath produced by this gas fired power plant are toxic.	Please see Master Response 2.5.
111.03	Furthermore, this site is located on top of many buried waste sites from previous industrial wastes and we need protection from these now and in the future as mitigation and clean up itself presents health hazards to our air and ground water.	Please see Master Responses 2.1.
111.04	It's time to retire this plant once and for all because of it's proximity to thousands of South Bay residents.	Please see Master Response 2.1.
112.01	I am against keeping the AES power plant in Redondo Beach operating past the currently planned permanent shutdown date of December 31, 2020.	Please see Master Response 2.1.
112.02	This gross polluter—of water, air, and noise---is no longer	Please see Master Responses 2.1, 2.3, and

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	needed for the power grid.	2.5.
113.01	Please do not extend the lease agreement for the AES power plant in Redondo Beach.	Please see Master Response 2.1.
114.01	We share our deep concerns about extending the AES power plant beyond its proposed end date	Please see Master Response 2.1.
114.02	The health of not only the beach cities but Torrance neighborhoods are and have been adversely affected for decades	Please see Master Responses 2.1.
114.03	We need to stay on course, stop operation at the designated time. With 21,000 people living within 1 mile of the AES power plant and due to the ocean breezes and their ability to carry airborne pollutants, thousands more households are in its direct path	Please see Master Responses 2.1 and 2.5.
114.04	This should not be allowed to prolong the health hazards to people, marine life and the environment.	Comment noted. Please see Master Responses 2.3 and 2.5.
114.05	Please vote to do the right thing. Decommission the power plant as soon as possible - protect people and our environment.	Please see Master Response 2.1 and 2.2.
115.01	You should stick by your original commitment of closing the AES facility on Dec.31.2020. We don't need that	Please see Master Response 2.1.

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	eyesore on our beach!!	
116.01	<p>Please follow the above agreed upon plan to demolish the AES plant. The residents of the Redondo Beach Community Have long-awaited this closure and demolition. There are wetlands behind the plant that would be wonderful to have let our community explore and have access to this land.</p> <p>There is such a lack of outdoor communal space here in South Redondo, please restore its beauty and bring nature back to all of us, we will be good stewards and generations will enjoy the land for years to come.</p>	Please see Master Responses 2.1 and 2.4.
117.01	I'm writing to ask you to please act to close and remove the AES facility and power lines in Redondo Beach as soon as possible. Close it by the end of 2020 as was agreed to, with no more plant operation, please. I want the site to get redeveloped into a maximum open space with public areas such as parks.	Please see Master Response 2.1.
117.02	I live in Manhattan Beach and even though this is not in my town, it's the beach cities, and it affects us all. All parties need to address issues of rising waters and climate change, and use this property thoughtfully. I hope the city and the board can work with state and county monies to develop it into a multi-use space that allows for controlled flooding, recreation, and even office, retail, and housing. I suggest waterfront park development such as	Comment noted. Please see Master Responses 2.1 and 2.4.

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	those by Weiss/Manfredi in Hunter’s Point, or work by SWA/Balsey such as South Waterfront Greenway or Westshore Park in Baltimore.	
118.01	Please do not extend the operation of the Redondo Beach AES plant. The power it produces is not needed and it causes more harm to the air we breathe and to the ocean through its cooling process	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
119.01	<p>I have looked forward to the closing of the AES Plant for many years. It is time for a new chapter. It has taken so long to get here. Please do not extend AES operations beyond the 2020 deadline.</p> <p>Residents have waited a long time and are ready for the space to be redeveloped to maximize open space and make our city even more beautiful.</p>	Comment noted. Please see Master Responses 2.1.
120.01	I oppose an extension to the retirement of the AES Redondo Beach power plant. It is a source of gas and particulate pollution and also noise to the entire South Bay area including Manhattan Beach, where I reside. Hermosa and Redondo Beach have voted unanimously to oppose any extension.	Please see Master Responses 2.1 and 2.5.
121.01	As a lifelong resident of Redondo Beach, I implore you, do NOT extend the operation of the AES power plant.	Please see Master Response 2.1
121.02	I'm tired of breathing the smoke plumes put out by this	Comment noted. Please see Master

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	<p>plant.</p> <p>I'm tired of being woke up in the middle of the night.</p> <p>I'm tired of this plant not only polluting the air we breath but the water we swim in.</p> <p>You MUST DENY any extension of the operation of this plant otherwise know that you are continuing to contribute to the poor health of the citizens of the South Bay.</p>	<p>Responses 2.1, 2.2, 2.3, and 2.5.</p>
122.01	<p>Please ensure that the AES Redondo power plant not be extended beyond December 2020. We want that plant officially shut down.</p>	<p>Pease see Master Response 2.1 and 2.2.</p>
123.01	<p>I strongly urge you to NOT extend the retirement of the AES power plant in Redondo Beach past December 2020.</p> <p>Doing so would not serve the residents of Redondo Beach and surrounding areas. The time has long passed for this power plant to be retired. We as a community have had enough damage to the coastline, air and water pollution and particulates in the air we breath produced by this power plant for decades.</p>	<p>Please see Master Responses 2.1, 2.3, and 2.5.</p>
123.02	<p>It's time has come and gone. For many years now it has been operating at an extremely low capacity, if at all. There is no justification for an extension. Please uphold it being retired as scheduled in 2020.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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124.01	<p>But, we in the majority stand shoulder to shoulder with Mayor Bill Brand as well as Reps. Al Muratsuchi and Ben Allen, County Supervisor Janice Hahn, and the local school boards in opposing any extension of the operating permit for the AES powerplant.</p>	Please see Master Response 2.1.
124.02	<p>That is the subject at hand; quality of life. The AES powerplant has long since worn out its welcome and, as the majority of civic, government, and private citizens proclaim, it is time for it to go! Tolerating it one more year is utterly unacceptable! Scanning the magnificent Pacific Ocean from the top of 190th/Anita street one can't help but be appalled at the blight that the AES powerplant presents.</p> <p>Please, stick to the original plan and shut it down at the end of the year. It is what we want for our city, and for the life of our children, and their children.</p>	Please see Master Responses 2.1 and 2.2.
125.01	<p>We are writing in favor of closing the AES Power Plant this December 31st, as planned. The people of Redondo Beach have suffered too long from the blight and environmental degradation that this plant has caused for too many years on our coast. To even consider extending operation for one minute longer would be a betrayal to the people of Redondo Beach and our neighboring communities</p>	Please see Master Responses 2.1 and 2.2.
125.02	Damage to the sea creatures and local water quality	Please see Master Response 2.3.

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	would only continue if operation is allowed to continue.	
125.03	Our city has historically been in the tortuous grip of predatory businesses for as long as anyone can remember. Their influence on former city officials had robbed us of our rightful voice in our own government on other matters. Now we see this happening again as we watch those former officials lobbying on behalf of the AES organization.	Please see Master Response 2.1.
125.04	Please rule in our favor, for closure this year..	Please see Master Responses 2.1 and 2.2.
126.01	People in Redondo Beach, Hermosa Beach, and the South Bay have suffered long enough. Please do not extend the operation of this plant for one day past this December, 2020. That was the decision ten years ago, and for good reason. Please honor this decision.	Please see Master Responses 2.1 and 2.2.
127.01	<p>Don't be fooled by those with financial conflicts of interest who claim that an extension to operate the AES/SCE Power Plant will be good for Redondo Beach or other surrounding cities; nothing could be further from the truth.</p> <p>We don't need their seemingly charitable promises to remediate the site – they're already obligated to do that by law at no cost to the City of Redondo Beach or its residents — AES has stated this publicly numerous times over the last 20 years. Nor do we need their promises of dedicated parkland — parks and open space are already the only permitted use on the site. They need a zoning</p>	Please see Master Response 2.1 and 2.2.

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	change and entitlements that will require a public vote before they can build anything. Their purported promises of parkland and public amenities, if only we allow them to continue their operation, is just a con – don't fall for it.	
127.02	So why would AES and the new property owners want to continue to operate this plant? Money! And lots of it. Tens of millions of dollars of profit to split at the expense of the local residents and businesses. The actual amount is all a big secret of course, but know that the City of Oxnard recently agreed to stand down from their opposition to an extension for the GenOn power plant in their town because GenOn agreed to pay \$25 million to demolish and remediate the site once the three-year extension is over. One can imagine that there is at least another \$25 million waiting for GenOn though, making a three-year extension worth at least \$50 million.	Comment noted. Please see Master Response 2.1.
127.03	Redondo Beach doesn't need such promises of remediation. If the new owners' intent is to walkaway from the 50-acre mess they just bought, the City, the County and the State have several tools at their disposal to require demolition, clean-up and remediation, including eminent domain.	Comment noted. Please see Master Response 2.1.
128.01	I support The of CLOSING the Redondo Beach power plant in DECEMBER 2020 as originally scheduled. Please don't pollute our air any longer with this outdated power	Please see Master Response 2.1 and 2.5.

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	plant.	
129.01	As a life-time resident of the South Bay, I respectfully request that you retire the AES Power Plant in Redondo Beach as scheduled on December 31, 2020. The site belches toxic smoke and blasts jet engine like noise...it's an environmental disaster. DO NOT extend the operation of this site PLEASE!!!	Please see Master Response 2.1 and 2.5.
130.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Please see Master Responses 2.1 and 2.2.
130.02	Redondo Beach's Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in "potential impacts to marine life," according to the 2010 Final SED.	Comment noted. Please see Master Response 2.3.
130.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire	Comment noted. Please see Master Responses 2.1 and 2.4.

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	<p>and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	
130.04	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Response 2.4.
130.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
130.06	Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives.	Please see Master Response 2.2.

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	<p>As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p>	
131.01	<p>Please do not bend the rules to allow another three years of power plants using sea water to cool their boilers. Enough. We have alternatives. As long as they can deplete these worn out facilities the longer we wait for a more environmentally appropriate solution.</p>	<p>Please see Master Responses 2.1 and 2.3.</p>
132.01	<p>The AES plant is an archaic, polluting eyesore that serves no benefit to the community. It needs to be gone as scheduled this year. No more delays.</p>	<p>Please see Master Responses 2.1, 2.2, 2.3 and 2.5.</p>
133.01	<p>We are Redondo Beach residents who strongly urge the closure of the AES power plant as scheduled. The plant serves no purpose, pollutes our air and costs wasted money!</p>	<p>Please see Master Responses 2.1, 2.2, and 2.5.</p>
134.01	<p>We are Redondo Beach residents who strongly urge the closure of the AES power plant as scheduled. The plant serves no purpose, pollutes our air and costs wasted money!</p>	<p>Please see Master Responses 2.1, 2.2, and 2.5.</p>
135.01	<p>I'd like to express my support to ensure that the Redondo</p>	<p>Please see Master Responses 2.1, 2.2, and</p>

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	<p>Beach AES Power Plant stay on schedule to be closed by the end of 2020. The studies and statistics on this plant tell a very clear story, the damage it does to California far outweighs any production. As a resident of Redondo Beach with Asthma I feel these negative impacts constantly.</p> <p>Please consider holding AES to their 2020 agreement.</p>	2.5.
136.01	<p>I am sure you're getting all sorts of letters, but i wanted to add my voice in opposition to any extension of the AES plant operating time. having an antiquated, pollution spewing plant still operating when there are so many better options and a dwindling need means the date set so many years ago should be kept too.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
137.01	<p>I am opposed to the extension of the AES power plant to operate for another 3 years. As a new resident of Redondo Beach (who lives less than a mile away from the site), I find it mindboggling that such a structure exists in one of the most valuable pieces of waterfront in the state.</p>	Please see Master Response 2.1.
137.02	<p>I fear the air and water pollution that the plant creates especially since my family and I enjoy swimming in the ocean every chance we get (and not to mention within a half mile of the plant).Please help us stop this plant from operating for another three years.</p>	Please see Master Responses 2.3 and 2.5.
138.01	<p>It's incredible if not just outright shocking to hear that your board is seriously considering extending AES's operation.</p>	Please see Master Responses 2.1 and 2.2.

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	<p>There is absolutely NO reason to extend the operation of the AES power plant when We the People here in Redondo Beach and the South Bay cities have worked so hard to get that polluting power plant shut down and dismantled. Please do NOT extend AES' operation as that was never the original agreement.</p>	
139.01	<p>I oppose any operating extension for the AES Redondo Beach power plant. As a 40+ years resident of Hermosa Beach, I am witness to the fact that this plant is way beyond its useful life, is not needed, is highly polluting (air and WATER). This plant has and is adversely affecting the ocean and the residents surrounding it. If, as the proponents claim, there is a need for “back-up” power there are better situated, less polluting, more efficient sources available. Please do not extend the operating period for this antiquated facility.</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
140.01	<p>My wife and I are residents of Hermosa Beach, CA who live less than 1/2 mile from the Redondo Beach powerplant. We do not agree that the plant should be open longer than the current planned date of December 31,2020 for the following reasons.</p> <p>It is an eyesore that pollutes the air and ocean</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
140.02	<p>It is a threat to sea life as it kills everything that enters its intake pipes used for cooling</p>	<p>Please see Master Response 2.3.</p>

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140.03	<p>The plant releases large amounts of air pollution each time it operates endangering our health and the health of our family.</p> <p>We have heard and seen it start up many times as the startup is announced with a thundering roar even in the middle of the night. As it starts up, we see a plume of black smoke which we believe is dangerous to breathe.</p> <p>It is time to end the plant's operation</p>	Please see Master Responses 2.1 and 2.5.
141.01	<p>There has been enough NOISE and POLLUTION for years and we need to SAVE ourselves and our coastlines from Tons of Particulates per year!</p> <p>To whom it may concern:</p> <p>We must save ourselves and our coastlines from tons of particulates per year. There has been too much noise and pollution.</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
141.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	<p>Comment noted. Please see Master Response 2.1, 2.3, and 2.5.</p>
141.03	<p>A previous health impact study conducted by the City of Hermosa Beach found-even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people</p>	<p>Please see Master Response 2.5.</p>

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	<p>who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
141.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
141.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1, 2.2, 2.4 and 2.5.
141.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Please see Master Responses 2.2, 2.3, and 2.4.
141.07	<p>They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.</p>	Please see Master Response 2.2.

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141.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
142.01	<p>I write this letter to request an immediate closure of the Redondo Beach Power Plant, as our community strongly believes that this facility has lived its usefulness to Southern California by now.</p> <p>To the benefit of our beach communities, we sincerely hope your swift actions can result in quick closure of this plant, and mitigate any extensions of operating this plant any longer than necessary.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
143.01	Please shut down the AES Power plant in December 2020. This was supposed to happen 10 years ago and is not only an eye sore but it is not functioning anymore up to today's standards.	Please see Master Responses 2.1. Additionally, it is unclear what standards are being referred to in the comment.
143.02	It is no longer safe and is pumping poisonous gases into our environment. We live in one of the most dense populations and this is definitely a health factor for everyone in the surrounding area.	Please see Master Responses 2.1 and 2.5.
143.03	It is time to step up to today's standards and look out for what is right for the people who live here. It is simply not generating the power it used to and is obsolete for this generation. Please do what is right and let the city put something there that is more productive and beneficial for	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	everyone.	
144.01	As a resident of Redondo Beach, we have suffered the effects of a massively polluting power plant in our small community for years. We were promised the plant must be retired by 12/31/2020 because it was, and is, no longer needed.	Please see Master Responses 2.1, 2.2, and 2.5.
144.02	We do, however, desperately need parks and housing. This resource is desperately needed to provide open space and housing for our community. Please keep your promise and close the plant.	Please see Master Response 2.1.
145.01	<p>I'm 100% against granting an extension to the AES power plant. As a Hermosa Beach resident and property tax payer for over 15 years, I've seen first hand how the plant adds terrible amounts of pollution to our space. It's been an eye-sore among the beauty of the South Bay for long enough and it needs to go.</p> <p>Basically every local city and organization is against this extension and the majority of citizens are obviously against an extension.</p>	Please see Master Responses 2.1 and 2.5.
145.02	I'll just say this...AES will delay this for as long as they are allowed. Their requests will be full of many, many excuses as to why certain things cannot be done and that they need this extension. Well, if we've learned anything over the past 8 weeks of quarantine, it's that lots of things can be done when you're forced to them. Those roadblocks to	Comment noted. Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
	<p>allowing people to work from home fell down faster than a barrel going over Niagara Falls. The same will be true here when we DENY the extension.</p> <p>Please stand firm, deny the extension, and watch as AES manages to do what they need to do and what we the local, tax-paying citizens of the South Bay deserve.</p>	
146.01	<p>I oppose the AES power plant retirement date extension.</p> <p>I live in Redondo, and I have asthma. The fine particulate pollution is bad for my health. I am also very concerned about the carbon emissions.</p>	Please see Master Responses 2.1 and 2.5.
147.01	<p>I am a 16 year South Bay resident and am writing to express deep concern about the potential for the AES Redondo Beach power plant to remain open beyond December 2020. Few things unite our community today, but there is unanimous desire among area residents that the power plant's time has passed. I beg you not to extend the plant's life and give our community this small victory we so desperately need.</p>	Please see Master Responses 2.1 and 2.2.
148.01	<p>But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Response 2.1.
148.02	<p>I have an 11 month old baby and am concerned about the air quality for her little lungs. There are concerns about</p>	Comment noted. Please see Master

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	<p>local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES powerplant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Response 5.5.
148.02	<p>The purview of the California Water Resources Control Board is water resource quality and how it is negatively impacted by the continued operation of once through cooling (OTC) power plants. This is exactly why the plant is scheduled to cease operation on December 31st, 2020. The intake and outflow of the AES power plant devastates the marine environment off our coast. It has damaged the marine environment for decades. It is the stated mission of the California Water Resources Board; To preserve, enhance and restore the quality of California's water resources for the protection of the environment, public</p>	Please see Master Responses 2.1, 2.2, and 2.3.

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	<p>health and all beneficial uses for the benefit of present and future generations.</p> <p>Please uphold the mandated retirement deadline of 12/31/2020 for AES Redondo Beach.</p>	
149.01	<p>We want to add our names to those who oppose the extension of operations of the AES Redondo Beach power plant past its scheduled permanent retirement date of December 31, 2020.</p> <p>We have lived a little over a mile to the east of the AES power plant site for many years and have been subjected to pollution caused by the plant spewing tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise that disturbs and awakens everyone nearby at all hours of the night.</p> <p>This AES power plant needs to be retired and demolished sooner than later to make way for higher uses that will benefit all the communities that surround the site and contribute to their citizens' better health.</p>	Please see Master Responses 2.1, 2.2, and 2.5.
149.02	There is a united opposition to the AES power plant's operation extension from local and state elected officials, recognizing the preferences of the voters who elected them. State Senator Ben Allen and Assembly member Al	Comment noted. Please see Master Response 2.1.

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	<p>Muratsuchi have co-signed a letter to the Board opposing any extension, as has L.A. County Supervisor, Janice Hahn. The Redondo Beach City Council and School Board, Hermosa Beach City Council and School Board, the Beach Cities Health District, Heal the Bay and the Surfrider Foundation have all publicly announced opposition to any extension of the AES Redondo Beach power plant.</p>	
149.03	<p>We hope the Board will reconsider any intention to extend the AES power plant's operation past December 31, 2020. Any need for power resulting from such an extension is not as great as the good health needed by the citizens of the communities surrounding this ancient, pollution spewing dinosaur!</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
150.01	<p>The AES Redondo Beach power plant really needs to be shut down by the promised date of Dec 2020. It is polluting our air and it's getting tougher and tougher to breath, let alone the eye sore and the good that it would do our community.</p> <p>Please don't put money over the health of our community. This has been going on too long. Enough is enough.</p>	<p>Please see Master Responses 2.1, 2.2, and 2.5.</p>
151.01	<p>I am writing to ask that you vote NOT to extend the retirement date of the AES power plant in Redondo Beach beyond 12/31/2020.</p> <p>I live in Hermosa Beach and am concerned about local air</p>	<p>Please see Master Responses 2.1, 2.2, and 2.5.</p>

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	<p>pollution and carbon emissions from the aging units that adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	
151.02	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5%production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. It’s clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public’s health will benefit. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p>	Please see Master Response 2.5.
151.03	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant. This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon</p>	Please see Master Responses 2.1, 2.2, 2.4, and 2.5.

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	sink because wetlands are effective at capturing and storing carbon.	
151.04	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
151.05	I, as a resident of Hermosa Beach, join the Hermosa Beach City Council voicing opposition to the continued operation of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. I ask that you ensure that operations cease on its scheduled date of 12/31/2020 to cease operation.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
152.01	I join with the hundreds of Beach Cities residents who are opposed to granting any type of extension to the AES Power Plant of Redondo Beach. This Plant has not only been a source of severe pollution for several years, but remains an embarrassing eye-sore as well.	Please see Master Responses 2.1, 2.3, and 2.5.
152.02	Numerous studies have been conducted concluding that this antiquated source of power is no longer needed by this, or any other community. We urge you to veto any requests to give an extension for its operation, past the current end of year, 2020.	Please see Master Responses 2.1 and 2.2.
153.01	I strongly oppose the extension of the Redondo Beach	Comment noted. Please see Master

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	<p>AES Power Plant extension for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	<p>Response 2.1.</p>
153.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the</p>	<p>Please see Master Responses 2.1, 2.3, and 2.5.</p>

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	impact on property values.	
153.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
153.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Please see Master Responses 2.1 and 2.4.
153.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective	Please see Master Responses 2.1 and 2.4.

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	carbon sink because wetlands are effective at capturing and storing carbon.	
153.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
153.07	They are already, unexpectedly extending the retirement date of three other large powerplants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
153.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
154.01	I am reaching out to ask you to NOT extend the life of the AES Redondo Power Plant beyond this year. I support the original decision to cease operation of the plant by the end of this year. It is the most polluting and least efficient of the four coastal powerplants and is running by 1950's technology.	Please see Master Responses 2.1, 2.2, and 2.5.
154.02	This power plant rarely produces electricity, and does not provide power directly to Redondo Beach or the South Bay, but it still pumps hundreds of tons of poisonous gas and dangerous particulate into our air every year.	Please see Master Responses 2.2 and 2.5.

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154.03	Its ocean-water cooling system kills enormous amounts of marine life as well.	Please see Master Response 2.3.
154.04	We should not have to continue to live in this toxic environment and have our views of this beautiful coastal community obstructed by this facility. The time has come and we should not have to live like this anymore. I hope my voice is heard and I look forward to your response.	Please see Master Response 2.1.
155.01	Please DO NOT EXTEND the operations of the outdated, gas-fired generator at the AES power plant in Redondo Beach. As a local resident, the health impact as found this power plant was the largest source of fine particulate pollution in the area.	Please see Master Responses 2.1, 2.2, and 2.5.
155.02	3 other power plants in the area have been extended so grid reliability seems to have been resolved and AES plant unnecessary.	Please see Master Response 2.2.
155.03	Therefore why continue to pollute a beautiful area. We hope that you can help the South Bay residents who want restore coast wetlands, water quality, marine life and quality of life by voting NO EXTENSION.	Please see Master Responses 2.2, 2.3, and 2.4.
156.01	As a Redondo Beach resident for the last 10 plus years, I want to add my voice to the call to forever close the AES Power Generation Site in Redondo Beach this year as planned. It's old dirty tech that is taking up very precious	Please see Master Response 2.1.

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	land in the South bay.	
157.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Please see Master Response 2.1.
157.02	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC powerplant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Please see Master Responses 2.3.
157.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast. The California Coastal Commission has reaffirmed that	Comment noted. Please see Master Responses 2.1, 2.3, and 2.4.

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	<p>the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life, and provide needed habitat for migrating birds.</p>	
157.04	<p>The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”</p>	Please see Master Responses 2.1 and 2.4.
157.05	<p>And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.</p>	Please see Master Response 2.2.
157.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become</p>	Please see Master Response 2.2.

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	even more unlikely to occur.	
157.07	<p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly deserving of retirement to allow the park and restoration plans to proceed apace.</p>	Please see Master Response 2.1.
158.01	<p>Now, I am a 20 year old adult in college who is disgusted that that monstrous machine that is still outside my window. Enough is enough.</p> <p>The state, the community, the communities around us, NGOs, our politicians, the voters are all in agreement that it needs to go. It is your job to protect the people you represent.</p>	Please see Master Response 2.1.
159.01	<p>I urge you to protect marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago.</p> <p>The Alamitos (Long Beach) and Huntington Beach facilities have largely been replaced already. At Alamitos, three of six units have already been taken offline. At</p>	Please see Master Responses 2.1, 2.2, and 2.3.

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	<p>Huntington Beach three of four have been decommissioned.</p> <p>The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018.</p>	
159.02	<p>With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants for grid reliability will be reduced even further.</p> <p>Besides the damage to marine life, these plants damage public health and contribute to climate change. We need a just transition away from fossil fuels and that should begin by replacing these polluting powerplants with power from renewable sources.</p>	Please see Master Response 2.2, 2.3, and 2.5.
160.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease.</p>	Comment noted. Please refer to Master Response 2.1.

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160.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
160.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It’s clear that air quality in our City and the surrounding</p>	Please see Master Response 2.5.

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	area will improve significantly when this plan is permanently closed, and the public's health will benefit.	
160.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Please see Master Responses 2.1 and 2.4.
160.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1, 2.2, and 2.4.
160.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna	Please see Master Responses 2.3 and 2.4.
160.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
160.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at	Please see Master Response 2.2.

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	least 21% more electricity than California needs.	
161.01	Please oppose to the application for extension to the AES power plant operations in Redondo Beach. As you are aware of the communities surrounding the AES site have been anxiously awaiting the closing of their operations at the end of this year. The pollutions caused to the air and water are known facts. Additionally we should be switching to green energy instead of burning fossil oil in the middle of urban areas. As a resident and voter of Redondo Beach, I'm urging you to vote against the extension!	Please see Master Response 2.1, 2.2, and 2.5.
162.01	The plant has not been a significant producer of power for years, yet it continues to pollute. It has been and continues to be an eyesore and it sits on the last large piece of beach front property in the south bay.	Please see Master Responses 2.1 and 2.2.
162.02	Now we have a power plant new owner and the hope of dismantling the plant permanently. There is no reason to continue operations at the plant and both the Cities of Hermosa and Redondo Beach support its shutdown permanently. Do not allow the facility to continue operating for a second longer.	Please see Master Responses 2.1 and 2.2.
163.01	Please help these communities put a stop to this plant ,Let us use modern technologies for power not this type of polluter.	Please see Master Responses 2.1 and 2.2.
164.01	AES was already granted a 10 year extension which is	Please see Master Responses 2.1, 2.2, and

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	now ending. Enough! It's time to clean up the pollution and restore the coastal wetland. No further extensions!	2.4.
165.01	I am writing to ask that the AES plant retirement NOT be extended. I know it is used to ease the strain on the grid, but (thankfully) it is rarely used. It is too large and too polluting for the little value it provides.	Please see Master Responses 2.1 and 2.2.
165.02	<p>We get soot on our trees and sidewalks, and I'm convinced it's affecting our air quality. Plus it's bad for the marine life.</p> <p>On a selfish note, when it is "firing up" for use we are awakened (usually around 2 or 3am) by the incredibly loud sound, which lasts 45 minutes to an hour.</p>	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.
165.03	<p>So many people are using alternative energy sources (lots of solar!) I can't imagine this AES plant being helpful in the future.</p> <p>Please retire the plant at the end of 2020.</p>	Please see Master Responses 2.1 and 2.2.
166.01	<p>I am writing to express my STRONG OPPOSITION to extending the AES Power Plant's ability to spew debris into my air. PLEASE do not allow this to happen to the South Bay.</p> <p>I live within a block of the Power Plant, in Hermosa Beach. My address is 132 1st Street, Hermosa Beach. I can throw a stone and hit the monstrosity. At night, the</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.

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	<p>sounds are horrible, the black smoke that spews into the air frightens me and my kids. It is a threat to our health and certainly not what we are living in California for.</p> <p>We are in the City of Hermosa, but technically much closer to the Power Plant than most Redondo Beach residents. We don't get to vote on policy around the power plant, because we are not in the city limits of Redondo. It seems wrong, since we are a block away. We bought the house 5 years ago, and were told the power plant was not operational...almost never and was soon to close. We found out that it is operational, loud, dirty and horrible. But there was hope that the plan was in the works and a vote upcoming. We were devastated when the city voted down the last plan to close the plant and build residential and commercial property. It was a huge mistake. I don't believe there will ever be "Park land" there. I don't care about Parkland.</p> <p>PLEASE DO NOT ALLOW THIS AES POWER PLANT TO EXIST ONE MINUTE PAST IT'S END OF THE YEAR DEADLINE TO SHUTTER!!! I have a calendar counting the days. Please do not extend it.</p>	
167.01	<p>We are writing about the damage to our air quality affecting Los Angeles beaches with the active AES plant in Redondo Beach. This toxicity has no place nor need in a high density neighborhood bordering our natural resource of the ocean. Tens of thousands people reside</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5.</p>

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	<p>here and even more visit the beach. This is a travesty on any day, now add our current shelter in place when the earth is actually healing. Shame on AES and their supporters. Do not allow them to continue to pump hazardous chemicals into the air that actual human beings breathe! This air pollution travels through to you too, into the greater Los Angeles area. Please, please keep us healthy and safe!</p>	
168.01	<p>Please shut this plant down ASAP.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
169.01	<p>Keep the December 31, 2020 date to shut down the Redondo Beach AES Pwer Plant. Stop stalling and adhere to the date you preciously declared.</p> <p>Hermosa and Redondo Beach have voted unanimously to oppose any extension.</p> <p>This retirement date was agreed to 10 years ago. It's time to move on and remake our waterfront with the beauty and open space it deserves.</p>	<p>Please see Master Response 2.1.</p>
170.01	<p>The AES Power Plant in Redondo Beach needs to be shut down according to schedule.</p>	<p>Comment noted. Please see Master Response 2.2.</p>
170.02	<p>Redondo Beach mayor Bill Brand is recommending as extension based solely on fiduciary gain.</p>	<p>Comment noted. Please see Master Response 2.2.</p>
170.03	<p>This plant is antiquated, an eyesore and a proven gross</p>	<p>Please see Master Responses 2.1, 2.2, and</p>

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	polluter. Don't be swayed by money in this case, please. Do the right thing. Thank you,	2.5.
171.01	The Redondo beach power plant is a health hazard to human and marine life and should be shut down in 2020 as planned. To extend the shutdown by three years will only continue to jeopardize the long term health of every resident and do irreparable damage to the health of California's marine life. Please put our ecosystem and human lives first!	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
172.01	I'm writing about the AES Power Plant in Redondo Beach. The plant is scheduled to cease 12/31/2020. I understand you are voting to extend that. Please keep the 12/31/2020 date. I'm a mother of 3 young kids and I am very concerned about the local air pollution and carbon in missions coming from this outdated, gas-fired generator. This plant is unnecessary and we should be responsible to not utilize pollutants when it's not necessary. This pandemic has showed us the damage humans are doing to the planet. The air is the cleanest it's been in a long time. You have a lot of local residents and organizations against this plant. Look at who is for it and who is against it. Be on the right side of this. The health of a tightly Seanad community is depending on you to do what is right.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
173.01	I'm writing to oppose the extension of the AES Redondo Beach Power Plant. It was already agreed upon that the	Please see Master Response 2.1 and 2.2.

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	<p>plant would cease operations on December 31st of this year. There is NO NEED for an extension as outlined by the facts stated below:</p> <p>AES Redondo is not needed for grid reliability.</p>	
173.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	Comment noted. Please see Master Response 2.1.
173.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5%production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate</p>	Please see Master Response 2.5.

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	<p>emissions kills more than double the number of people who die from breast cancer in California.</p> <p>Please keep your word to cease operations at the end of this year. The health of our community depends on it.</p>	
174.01	<p>Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.</p> <p>AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most poluting per kilowatt of any coastal plant still running.</p> <p>AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.3.
174.02	<p>There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission)</p>	Comment noted. Please see Master Responses 2.1 and 2.4.
174.03	<p>Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to</p>	Comment noted. Please see Master

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	<p>maintaining power-grid reliability; therefore we advocate that is operating live not be extended.</p> <p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	Responses 2.1 and 2.2.
175.01	It has come to my attention that the California State Water Resources Control Board will be voting to extend the retirement of the AES Power Plant. I would urge the board to keep the plant closed. It is an relic of a bygone age and it needs to remain closed if not demolished.	Please see Master Response 2.2.
176.01	<p>I realize that it's difficult to read all of the input you receive on issues such as this, and I acknowledge how our current crisis with CV-19 may make closing the Redondo Beach Power Plant unimportant. For those of us who live in the South Bay, nothing could be further from the truth - myself and everyone I know (I'm a 30 year resident of Redondo Beach) want to see the AES plant closed as soon as is humanly possible.</p> <p>Many of us, citizen activists, local politicians, mayors, local businesses, and others have worked hard for many, many years to remove this polluting, unneeded plant from</p>	Comment noted. Please see Master Response 2.1, 2.2, and 2.5.

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	<p>our coast. You have already seen the pictures of belching smoke and of wires and power towers and smokestacks. However, this issue is a lot more than just those issues, it is about reclaiming the quality of life for not only the citizens of Redondo and Hermosa Beach, but for all who use this area for recreation, tourism, and enjoyment. I'm not a power expert, I've read the same reports you have regarding the reasons for the request to extend the deadline (money, politics, real estate profits for developers), but this looks and feels like another in a series of lost opportunities to do the right thing. The right thing to do is to retire this plant on December 31st, 2020. After many votes, hearings, efforts by local mayors, citizens speaking out, over many, many years it's time for this plant to close, and allow the area to move on. Please, let's close this unneeded plant.</p>	
176.02	<p>AES is responsible for the environmental cleanup, the state doesn't need the power, and the possibilities for improving the air, water, and aesthetic quality (parks, open space, air quality) of the South Bay are endless. Thanks for your time and your vote to close this plant on December 31st, 2020. Let's move on to the next phase of this long saga, the cleanup and renewal of our precious coastline.</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
177.01	<p>I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8. All of</p>	Please see Master Response 2.1.

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	those power generating units should be permanently retired as of 12.31.2020 according to the OTC Policy set a decade ago.	
177.02	<p>The AES proposal to extend the life of the obsolete Redondo Beach plant for another three years is an affront to the sensibilities of residents in my community.</p> <p>Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC powerplant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.</p>	Comment noted. Please see Master Response 2.3.
177.03	<p>Redondo Beach has worked to buy and develop a substantial part of the 51-acre power plant site for wetland restoration and as a public park. The areas surrounding the facility are among the most densely populated coastal areas along the entire California coast so a public park is needed in there.</p> <p>It’s important to note that the historic Old Redondo Salt Lake wetlands is where the Redondo Beach AES plant is located. The wetlands restoration is critically needed to improve oceanwater quality, protect marine life and provide needed habitat for migrating birds. If you extend</p>	Comment noted. Please see Master Responses 2.1 and 2.4.

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	<p>the power plant’s compliance date past December 31, 2020, funding to acquire the parkland & restore the wetlands is likely at risk.</p> <p>I oppose extending the current OTC compliance deadline for the Redondo Beach Generating Station beyond the end of 2020.</p>	
178.01	<p>I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p>	<p>Please see Master Response 2.1.</p>
178.02	<p>Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC powerplant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.</p>	<p>Comment noted. Please see Master Response 2.3.</p>
178.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.4.</p>

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	<p>site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	
178.04	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Response 2.4.
178.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
178.06	Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11,2020, unemployment in L.A. County has	Please see Master Responses 2.1 and 2.2.

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	<p>now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p> <p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the long standing OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace."</p>	
179.01	<p>Please shut down the AES plant.</p> <p>AES Redondo is a gas-fired, 1950s-technology power generating station, the least efficient and most polluting per kilowatt of any coastal plant still running.</p> <p>AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more</p>	Please see Master Responses 2.1, 2.2, and 2.3.

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	than are living within that distance of all tree of the other power plants combined.	
179.02	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, but the City of Redondo Beach had a deal with the owner of the plant to purchase shelf of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1 and 2.4.
179.03	<p>Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.</p> <p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
180.01	Please do not grant AES a 3-year extension for the power plant. Enough is enough. We have voted on this multiple times already. Our residents deserve to have our votes respected.	Please see Master Response 2.1.
181.01	We've experienced over the years horrendous noise and pollution sometimes to the point of noise decibel levels of	Please see Master Response 2.5.

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	above 100 when steam is released from there generators. This noise also includes movies filmed there with helicopters flying over head and explosions to the we hours of the morning. The wind is another factor and when it blows on shore we experience horrible odors possibly toxic.	
181.02	We feel such an obsolete plant should be replaced with open space and high tech employment with non polluting structures.	Comment noted. Please see Master Response 2.1.
181.03	Your review is welcomed.	Comment noted.
182.01	Dear California State Water Resources Board, please do not grant AES a three-year extension. I live in the neighborhood with my seven-year-old daughter and wife and the noise and the smoke generated by the plant is a constant concern and frustration for us.	Comment noted. Please see Master Responses 2.1 and 2.5.
183.01	I respectfully request that you allow the current schedule for closing the plant on December 31 st , 2020 to go on as scheduled. I understand the Pros and Cons of closing the plant and without getting to deep into the weeds about it I feel to Pros to close the plant far outweigh the cons. So PLEASE allow the current schedule to close the plant on December31st, 2020 to go on as planned.	Comment noted. Please see Master Responses 2.1 and 2.2.
184.01	Please honor your commitment and shut down the polluting AES power plant in Redondo Beach and do not	Comment noted. Please see Master

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	<p>grant an extension. One day past the original deadline is too long for a plant poorly placed from the beginning.</p> <p>My family, including two sons we are raising in Redondo Beach, are relying on you to place community, environmental integrity and our personal health over the greed and personal financial interests of stakeholders pushing for an extension.</p> <p>I trust that you will uphold the values that make California the best state in our union.</p>	<p>Responses 2.1 and 2.2.</p>
185.01	<p>Please ensure that there is no delay in shutting down and removing the AES Power Plant.</p> <p>It has been a blight on Redondo Beach for the 20 years I have lived here. It is an eyesore, noisy, smells, pollutes the air and water of Redondo Beach. There are times when loud hissing noises come from it and huge plumes of black smoke billow out of it blackening the sky.</p> <p>Please stick to the original decommissioning date and do not allow it to be extended.</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
186.01	<p>Redondo beach power plant is the least efficient and most environmentally damaging plant. Please stop use it and give the beautiful coast back to our Redondo Beach residents!</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
187.01	<p>The City of Hermosa Beach, City of Redondo Beach,</p>	<p>Comment noted. Please see Master</p>

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	<p>Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	<p>Responses 2.1 and 2.2.</p>
187.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	<p>Please see Master Responses 2.1, 2.3 and 2.5.</p>
187.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5%production- the AES</p>	<p>Please see Master Response 2.5.</p>

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	<p>power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
187.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.2.
187.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1 and 2.4.

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187.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Response 2.4.
187.07	They are already, unexpectedly extending the retirement date of three other large powerplants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
187.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
188.01	The pollution it emits is unacceptable and deadly. The particles cause lung cancer and asthma. This plume this power plant emits is within range of a highly dense residential community and three large schools where children play sports outside. We have testified for years in front of the school board, City Council for years about the blight this power plants causes this community. We successfully lobbied to stop the rebuilding of the plant, so please do not allow it to continue to operate any longer than the 2020 limit established. The community deserves your support on this for the years it has fought to rid our community of this power plant.	Comment noted. Please see Master Response 2.5.
189.01	We have been hoping all this time that the power plant would someday be no longer needed and would retire.	Comment noted. Please see Master Responses 2.1 and 2.2.

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	Please retire the power plant on time and let Redondo Beach and the surrounding cities enjoy a new chapter in their future. Thank you very much.	
190.01	<p>I respectfully request that you not extend the deadline for AES to close the Redondo power plant by December 31, 2020. I also request that you require AES and the new owner of the property to quickly and safely remove the power plant and power lines as early as possible in 2021.</p> <p>I have lived in the Redondo/Hermosa Beach area for 20 years. I currently live about a mile away from the power plant, next to the large unsightly power lines. I often see smoke and hear loud noises coming from the power plant at various hours of the day and late night.</p> <p>The dilapidated power plant is a relic from the last century. It is time to improve our waterfront's skyline and reduce pollution by having it closed and removed.</p>	Comment noted. Please see Master Responses 2.1 and 2.5.
191.01	Eye sore. Useless, too much noise. Its a thing of obsolesce.	Please see Master Responses 2.1 and 2.2.
192.01	Get rid of the Redondo Beach power plant, it smells, it's ugly, and we are sick of it. Do not extent it.	Please see Master Response 2.1 and 2.5.
193.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be	Please see Master Responses 2.1 and 2.2.

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	permanently retired at the time, as envisioned in the OTC Policy a decade ago.	
193.02	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC powerplant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Comment noted. Please see Master Response 2.3.
193.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide</p>	Comment noted. Please see Master Responses 2.1 and 2.4.

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	needed habitat for migrating birds.	
193.04	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Responses 2.4.
193.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
193.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11,2020, unemployment in L.A. County has now reached a "stunning" total of 24%.Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p> <p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.	
194.01	Please close the AES Power Plant in Redondo Beach on the agreed upon date of 12/31/2020. The surrounding cities of Hermosa Beach and Redondo Beach unanimously support shutting the plant down.	Please see Master Response 2.1
194.02	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.1 and 2.4.
194.03	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Please see Master Responses 2.1 and 2.4.
194.04	A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the	Please see Master Response 2.5.

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	<p>amount of nitrogen oxide emissions in a one-square mile area. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
194.05	<p>As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.</p>	Please see Master Response 2.2.
195.01	<p>It's time for the AES generating plant to be shut down and retired permanently. We have lived with the toxic air pollution and noise long enough.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5
196.01	<p>We oppose extending the mandatory closure date of the AES facility for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
196.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
196.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people</p>	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
196.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
196.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1 and 2.4.
196.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Please see Master Responses 2.1 and 2.4.
196.07	<p>They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.</p>	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
196.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
197.01	As a Hermosa Beach resident, I would like to register my opposition to any extension of operations of the outdated, gas-fired generator at the AES power plant. The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease then. There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.	Comment noted. Please see Master Responses 2.1 and 2.5.
197.02	A previous health impact study conducted by the City of Hermosa Beach found- even at 5%production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square-mile area.	Please see Master Response 2.5.
197.03	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has	Please see Master Response 2.1 and 2.4.

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	<p>been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	
197.04	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1 and 2.4.
197.05	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Please see Master Responses 2.1 and 2.4.
197.06	<p>Three other large power plants in this area are already extending the retirement date. We don't need AES Redondo for grid reliability.</p>	Please see Master Response 2.2.
197.07	<p>As the LA Times reported, California has a growing glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs. Please do the right thing and do not extend the operations of this power plant. T</p>	Please see Master Response 2.2.
198.01	<p>As a 40-year-long resident of the South Bay, I and my friends (both business and personal) have watched this</p>	Comment noted. Please see Master

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	<p>travesty called the Redondo Power plant debate drag endlessly on...a tug of war over an outdated, inefficient, polluting eyesore. Time after time, we've shaken our heads and questioned why it still stands as a decrepit example of indecision by those outsiders who do not live here, and have no stake in our community, other than through the possibility of short-term money. It is high time to put a stop to the waste and AES's backroom bargaining, designed to prolong squeezing the last profiteer-dollar from this decayed monolith, and move forward into a brighter, more supportive and enhanced future for South Bay families.</p>	<p>Response 2.1.</p>
<p>198.02</p>	<p>It's time to act like you really have our interests at heart. Help us stop this nonsense, not after 3 more years of back ward-facing uselessness, but now, by shutting this plant down.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
<p>199.01</p>	<p>I am writing to express my vehement opposition to any extension of the operation of the AES power plant in Redondo Beach. This is an enormous, ugly, polluting (air, water AND noise pollution) eyesore . Everyone I know has been counting the days until this ugly monster comes down, so our kids can grow up safely without it.</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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200.01	I moved to Hermosa Beach over 20 years ago and have literally had the promise of this electric plant being shutdown and removed for two decades.	Please see Master Response 2.1.
200.02	It is a horrible eye sore, dangerous in so many ways, and NOT necessary for the South Bay or otherwise for energy -it's just a financial choice for the owner and in no way benefits our community or the State or Country for that matter - it only benefits one or two businesses and it is of no interest or benefit to us	Please see Master Responses 2.1 and 2.2.
200.03	<p>While I'm all for businesses making money, they have had many years to do so and have made their money, and now it's time for them to honor their deal and shut down at the end of this year.</p> <p>Anything less seems politically and financially motivated, and not in any way in the best interests of the community. If we had an obligation to approve, that would be different as I am a fan of honoring agreements, good or bad, but in this case, to voluntarily agree to do something bad for the entire South Bay community to line the pockets of businesses</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	that we don't have an agreement to do so, is just unreal.	
201.01	Please do NOT extend the operation of the AES power plant in Redondo Beach. My family lives downwind of it, and there are several schools in the path of its emissions, and we should not have to continue to negatively impact health beyond the agreed closing date this year.	Please see Master Responses 2.1 and 2.5.
202.01	I have been a resident of Redondo Beach since 1989 and I have been helping the community to rid us of this Power Plant for years. The pollution it emits is unacceptable and deadly. The particles cause lung cancer and asthma. This plume this power plant emits is within range of a highly dense residential community and three large schools where children play sports outside. We have testified for years in front of the school board, City Council for years about the blight this power plants causes this community. We successfully lobbied to stop the rebuilding of the plant, so please do not allow it to continue to operate any longer than the 2020 limit established. The community deserves your support on this for	Please see Master Responses 2.1 and 2.5.

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	the years it has fought to rid our community of this power plant.	
203.01	I urge you to follow through on the promise to close the AES plant sited in Redondo Beach in December of 2020. As a Hermosa Beach resident near the Redondo border my family and I have endured the air, water and noise pollution from that plant for over 30 years.	Please see Master Responses 2.1, 2.3, and 2.5.
203.02	We have been counting down the days to it's closure at the end of this year, that was what was promised to us all. This last minute change to extend the plant's life for pure profit is a violation of our trust, the government's word and could not come at a worse time as we all are quarantined in our yards and at home 24/7.	Please see Master Response 2.1.
203.03	The plant is not necessary for energy production and I urge you to not extend the polluting life of this South Bay albatross.	Please see Master Responses 2.2 and 2.5.
204.01	We are vehemently oppose the requested extension of the retirement date for AES Plant in Redondo Beach, Ca. This plant closure timeline should not extended. The power plant is not needed and the negative impacts on this coastal area need to be stopped.	Please see Master Responses 2.1 and 2.2.

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	The residents of a Redondo Beach are relying on this board to reject this request for an extension.	
205.01	I'm writing in favor of closing the Redondo Beach Power Plant that is scheduled to close December 2020. It is time to close the plant as scheduled for the wellbeing of our health and our marine life. Please take the appropriate action for our community by shutting down this plant that pollutes our wonderful Beach Cities.	Please see Master Responses 2.1 and 2.2.
206.01	<p>As a resident of Redondo Beach, I oppose to any extension to keep open AES power plant beyond the end of this year 2020.</p> <p>We have suffered enough for many years. It has affected our quality of life, health, our environment, the marine life... to summarize few of the consequences to have a power plant in a super populated area next to the ocean.</p> <p>Please do your job and this will be your legacy!</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
207.01	On behalf of my beloved friend Austin Johnson, we do not want the power plant up anymore. Stop the abuse of the environment,	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	we want renewable energy and resources. Make America Clean Again!!!	
208.01	For the safety of our family and community, as well as our oceans, my family vehemently opposes the proposed extension for the AES power plant in Redondo Beach. We are in support of the planned retirement December 31,2020.	Please see Master Responses 2.1 and 2.2.
209.01	We have had our hopes up for many of those years that this totally unnecessary, polluting monstrosity would finally be closed and torn down, and that the land would be committed to a more useful, healthful purpose to serve the South Bay communities. We have come so close, with the December 31, 2020 deadline just ahead of us, only to hear that the current owner is asking to extend that deadline.	Please see Master Responses 2.1, 2.3, and 2.5.
209.01	We say NO! Enough is enough! A deadline is a deadline and there is no good reason for it to be extended. We stand with all of our community leaders and the overwhelming number of its citizens in asking you to please do not extend the deadline. The AES Power Plant must be closed and shuttered and	Please see Master Responses 2.1 and 2.2.

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	completely, permanently taken out of operation by the long-mandated 12/31/2020 deadline.	
210.01	I DO NOT want the AES, to have any extensions, whatsoever!	Please see Master Responses 2.1 and 2.2.
211.01	I oppose AES being allowed to keep the plant open any longer as it contributes to the pollution problem in our city and state as is not needed for power.	Please see Master Response 2.1, 2.2, 2.3, and 2.5.
212.01	It is unbelievable that given its proximity to our dense urban setting in the middle of a beautiful bay that its continued opening is being considered. Please close this plant without any further delays, please.	Please see Master Responses 2.1 and 2.2.
213.01	I strongly oppose an extension to the AES operation. I love the Redondo Beach community. I recently decided to move my family here for so many reasons, one of the biggest being the draw of the natural beauty and open spaces. The plant has always been the biggest negative for me and my family. I understand the need for energy, but if there's a way to provide cleaner energy to the region while converting that space to parkland it would make this little slice of heaven even more magical.	Please see Master Responses 2.1 and 2.2.

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214.01	<p>The power plant may have served its community well in the past but has been deemed to be no longer needed, not only by the voters here in our city but by your advisory committee as well.</p> <p>AES had been trying for years to make the best use of their investment by attempting to rezone and build condominiums, not to operate as a power plant. The voters knew this and rejected their ballot initiative to rezone.</p> <p>So we were very excited to learn that the new owners were planning to create parkland with the property.</p>	Please see Master Responses 2.1 and 2.2.
214.02	<p>How disappointed we are now to learn that the new owners are seeking an unnecessary extension. Are we to mobilize, yet again, to fight the deceptive measures of the power plant owners?</p> <p>You have stated in your own report from March of 2019 that, "At this time, SACCWIS does not recommend a change in compliance date for the Redondo Beach facility."</p> <p>I am asking you to please honor your recommendation and commitment to the people of California by not permitting another</p>	Please see Master Responses 2.1 and 2.2.

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	<p>extension. This is nothing more than a stall tactic. Enough is enough.</p> <p>Hermosa Beach and Redondo Beach have voted unanimously to oppose any extension. Please honor the wishes of the residents of these cities.</p>	
215.01	The life of the AES Redondo power plant should not be extended beyond December 2020.	Please see Master Response 2.2.
216.01	<p>I am writing to urge the State Water Board to NOT grant compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p> <p>The City of Redondo Beach has been working diligently with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo</p>	Please see Master Responses 2.1 and 2.4.

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	Beach facility are among the most densely populated coastal areas along the entire California coast.	
216.02	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Response 2.4.
216.03	<p>The energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p> <p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years is simply irresponsible.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding</p>	Please see Master Responses 2.1 and 2.2.

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	<p>OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.</p>	
217.01	<p>I have been a permanent resident of Redondo Beach since 1994 and I have supported my community for years to get rid of this health hazardous and inefficient Power Plant and true eye sore of Redondo Beach. The pollution it emits is unacceptable for a beach city like Redondo Beach and its residents. The particles emitted by the Power Plant can cause serious health issues such as lung cancer and asthma. The fumes and smoke pumped into the air when the plant is running are within close proximity of a highly dense residential community and three large schools where children play sports outside. These are all facts and not fictional imaginations.</p> <p>Hence, I urge you, for the sake of the Redondo Beach residents and the nice beach city they live in, to not allow the operation of the AES Power Plan any longer passed the established limit of 2020.</p>	Please see Master Responses 2.1, 2.2, and 2.5.

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218.01	<p>Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.</p> <p>AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most poluting per kilowatt of any coastal plant still running.</p> <p>AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.</p>	Please see Master Responses 2.1, 2.2, and 2.3.
218.02	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1 and 2.2.
218.03	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid	Comment noted. Please see Master Response 2.2.

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	<p>reliability; therefore we advocate that is operating live not be extended.</p> <p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	
219.01	I strongly disapprove of any extension to keep the AES Power Plant running. Please do what is needed to decommission the plant as it not necessary and an environmental hazard.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
220.01	<p>Please do not extend the AES power plant's existence. It's an ideal waste of space and an eye sore of magnitude.</p> <p>It's already regrettable that it might be delayed because of Covid-19, but please do not allow them to go beyond the current plan.</p>	Please see Master Responses 2.1 and 2.2.
221.01	The local communities fought long and hard, going to board meetings and community meetings, walking streets door to door, and calling people, to get rid of the AES plant and	Please see Master Responses 2.1 and 2.2.

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	its pollution. We were promised it would shutdown in 2020. Please shut in down this year!	
222.01	<p>I urge you to protect marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago.</p> <p>The Alamitos (Long Beach) and Huntington Beach facilities have largely been replaced already. At Alamitos, three of six units have already been taken offline. At Huntington Beach three of four have been decommissioned.</p> <p>The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018.</p>	Please see Master Responses 2.1, 2.2, and 2.3.
222.02	<p>With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants for grid reliability will be reduced even further.</p> <p>Besides the damage to marine life, these plants damage public health and contribute to</p>	Please see Master Responses 2.2, 2.3, and 2.5.

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	climate change. We need a just transition away from fossil fuels and that should begin by replacing these polluting powerplants with power from renewable sources.	
223.01	I am in opposition to the extension of the AES-Redondo power plant using the once through cooling system as unfortunately now recommended by the PUC and others. The plant is scheduled to cease operations on 12/31/2020 and I ask that you ensure that deadline stays in effect. Retiring the AES plant and restoring coastal wetlands will improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway.	Please see Master Responses 2.1, 2.2, 2.3, and 2.4.
223.02	There are also concerns about local air pollution and carbon emissions from this aging power plant which would adversely affect the 21,0000 people living within 1-mile of this heavy polluter in Hermosa Beach, Torrance and Redondo Beach. And the effects of this pollution will extend far beyond that. A previous health impact study found that even at 5% production, the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-	Please see Master Responses 2.1 and 2.5.

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	square mile area. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. It's clear that air quality in Redondo Beach and the surrounding area will improve significantly when this plant is permanently closed.	
223.03	Redondo Beach has been working diligently with the state and county to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and a new owner are going to benefit financially if the plant operation is extended. Unfortunately, that would be at the expense of the residents and businesses of Redondo Beach, Hermosa Beach and Torrance.	Please see Master Responses 2.1 and 2.2.
223.04	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
223.05	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed	Please see Master Responses 2.1, 2.2, 2.3, and 2.4.

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	habitat for migrating birds along the Pacific Flyway, and for native flora and fauna.	
223.06	They are already extending the retirement date of three other large power plants in this area. We don't need AES-Redondo for grid reliability.	Please see Master Responses 2.1 and 2.2.
223.07	<p>As the Los Angeles Times reported, California has a big, and growing, glut of power, and has found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.</p> <p>So, please, consider the negative impacts of this situation if this power plant's use is extended, and also the potential positive outcomes if it should be shut down and retired, as was the intention 10 years ago, at the end of this year, 2020. We are all counting on you to do the right thing for everyone's best future.</p>	Please see Master Responses 2.1 and 2.2.
224.01	<p>Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.</p> <p>AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient</p>	Please see Master Responses 2.1, 2.2, and 2.3.

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Letter and Comment Number	Comment	Response
	<p>and most polluting per kilowatt of any coastal plant still running.</p> <p>AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all three of the other power plants combined.</p>	
224.02	<p>There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission)</p>	<p>Please see Master Responses 2.1, 2.2, and 2.4.</p>
224.03	<p>Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that its operating life not be extended.</p> <p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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	<p>District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	
225.01	<p>I am writing to respectfully request this power plant be permanently closed, as planned, at the end of this year.</p> <p>Unfortunately, I have learned an extension to continue operating may be granted, and that is extremely disheartening.</p> <p>This power plant is a major polluter and and ugly eyesore in our community.</p> <p>I stand with Redondo Beach Mayor Bill Brand, and the entire community when I say we want this power plant permanently shut down.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
226.01	<p>Please keep the December 31, 2020 deadline to shut down the AES power plant.</p> <p>This power plant is incongruous with the surrounding neighborhood. I have two young kids, 1</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.</p>

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	<p>and 3 years old. In my adolescence, I developed asthma. I still have it. Its not great. Please do not allow AES power plant to exist to have any possible contribution to anyone's child hood asthma.</p>	
227.01	<p>As a resident property owner and voter in Redondo Beach, I oppose the Water Board's considering any extension of operations of the power plant.</p> <p>I will spare you all the reasons I oppose it; I am sure you've heard it all before. (But if you need to hear more, my contact info is below.)</p> <p>This retirement date was agreed to 10 years ago. Please honor the request of the local citizens.</p>	Please see Master Response 2.1.
228.01	<p>I join with the hundreds of Beach Cities residents who are opposed to granting any type of extension to the AES Power Plant of Redondo Beach. This Plant has not only been a source of severe pollution for several years, but remains an embarrassing eye-sore as well. Numerous studies have been conducted concluding that this antiquated source of power is no longer needed by this, or any other community. We urge you to veto any requests</p>	Please see Master Responses 2.1, 2.2, and 2.5.

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Letter and Comment Number	Comment	Response
	to give an extension for its operation, past the current end of year, 2020.	
229.01	<p>Redondo Beach does NOT want AES granted an extension on closure date. This was already voted on 10 years ago.</p> <p>Our city wants to move on from this plant, and restore our green lands.</p> <p>Please do what is right.</p>	Please see Master Response 2.1.
230.01	<p>I am writing to urge you to please not extend the Redondo AES power plant's operation beyond the December 2020 deadline for decommissioning.</p> <p>While I love where I live, in the time that I have lived in Redondo, I have developed exercise induced asthma. I am confident that this is due to living directly east of the Redondo AES power plant as the wind blows the particles emitted from the plant in my direction. Additionally, the plant often does very loud steam releases late at night which is not only disruptive to our sleep, but is quite frightening to my young daughter.</p>	Please see Master Responses 2.1, 2.2., and 2.5.
230.02	I have watched the plant for years and can see that it is barely used at capacity—given that	Please see Master Responses 2.1, 2.2, and 2.5.

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Letter and Comment Number	Comment	Response
	<p>typically only one of five smokestacks is typically pumping smoke into the air. Given this, I do not believe that the electric grid demand is so great that it warrants keeping the plant open.</p> <p>I urge you to please vote to decommission the plant at the end of this year, for the health and safety of my family.</p>	
231.01	<p>As a 30 year homeowner in Hermosa Beach I oppose an extension of the AES power plant in Redondo Beach, Ca. The power plant is bad for our health and the environment. Please DO NOT extend life of AES power plant. Cease operations by the end of this year as discussed over and over.</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
232.01	<p>Our beaches are a great recreational and environmental asset. I urge you to protect recreation and marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31,2020, as scheduled ten years ago. In addition to being an eyesore, these plants damage public health, contribute to climate change, and threaten marine life. We need a just transition away from fossil fuels and that should begin by</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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	replacing these polluting power plants with power from renewable sources.	
233.01	<p>I oppose any extension to the retirement of the AES power plant.</p> <p>The power plant is a health hazard and eyesore. It is ridiculous to have to shelter at home to protect ourselves from coronavirus YET be continually exposed to the carcinogenic emissions from the power plant. Please proceed with Plan A, get rid of it, and make that area a protected, natural swamp land for the sake of everyone living in the area.</p>	Please see Master Responses 2.1 and 2.5.
233.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
233.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 210,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.
233.04	A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
233.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.2.
233.06	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.1 and 2.4.

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Letter and Comment Number	Comment	Response
233.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.1, 2.2, 2.3, and 2.4.
233.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
233.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
234.01	<p>I oppose the Redondo beach AES plant extension for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p>	Comment noted. Please see Master Response 2.1.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
234.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
234.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Responses 2.1 and 2.5
234.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this	Please see Master Responses 2.1 and 2.2.

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	is all at the expense of the residents of Redondo and Hermosa.	
234.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
234.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.2, 2.3, and 2.4.
234.07	They are already, unexpectedly extending the retirement date of three other large powerplants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
234.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
235.01	We are writing this email to oppose the extension of the retirement of the Redondo Beach AES Plant. We live right next to the plant, even though we live in South Hermosa	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.

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	<p>Beach. We oppose the extension for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p> <p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p>	
235.02	<p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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	<p>significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
235.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Responses 2.1 and 2.5.

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Letter and Comment Number	Comment	Response
235.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Please see Master Response 2.1 and 2.2.
235.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
235.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.2, 2.3, and 2.4.
235.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
235.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
236.01	<p>I truly support the below message and the stance taken! SHUT ITDOWN!</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES powerplant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please see Master Response 2.1.
236.02	There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.	Comment noted. Please see Master Response 2.1, 2.2, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
	<p>There are 21,000 people living within 1 mile of the AES powerplant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
236.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p>	Please see Master Responses 2.1 and 2.5.

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Letter and Comment Number	Comment	Response
	It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.	
236.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Please see Master Responses 2.1 and 2.2.
236.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
236.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Comment noted. See master responses 2.1, 2.3, and 2.4.

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Letter and Comment Number	Comment	Response
236.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
236.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
237.01	<p>I am writing this email to oppose any extension of operations of the AES power plant. The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease permanently at that time.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
237.02	It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.	Please see Master Responses 2.1 and 2.5

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237.03	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p> <p>Please do the right thing for both the people and the planet.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.
238.01	<p>I urge you strongly NOT to extend the operating license for the AES Redondo Beach facility past December 2020.</p> <p>Cooling of the plant by through-put sea water as used by this facility is bad for our ocean environment. It sucks in living creatures and kills them.</p>	Please see Master Responses 2.2 and 2.3.
238.02	<p>The particulate (soot) and gaseous output is unhealthy for people (like me) who live down-wind of the facility. And then there is the intermittent explosive noise that the power plant emits. Sometimes it sounds like gunfire; last night it sounded like a volcano getting ready to blow for over 45 minutes.</p> <p>I and my family have been eagerly waiting the shutdown. Please don't put it off any longer.</p>	Please see Master Responses 2.1, 2.2, and 2.5.

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Letter and Comment Number	Comment	Response
239.01	<p>I am writing to ask that you vote NOT to extend the retirement date of the AES power plant in Redondo Beach beyond 12/31/2020.</p> <p>I live in Hermosa Beach and am concerned about local air pollution and carbon emissions from the aging units that adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	Please see Master Responses 2.1, 2.2, and 2.5.
239.02	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. It’s clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public’s health will benefit. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills</p>	Please see Master Responses 2.1 and 2.5.

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	more than double the number of people who die from breast cancer in California.	
239.03	The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant. This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Comment noted. Please see Master Responses 2.1 and 2.4.
239.04	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.2, 2.3, and 2.4.
239.05	I, as a resident of Hermosa Beach, join the Hermosa Beach City Council voicing opposition to the continued operation of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. I ask that you	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	ensure that operations cease on its scheduled date of 12/31/2020 to cease operation.	
240.01	<p>Please consider the health and well being of our community over profits. Keeping the Redondo Beach power plant open will only benefit a small few while risking the health of marine life.</p> <p>I am a lifelong resident of Southern California. The health and beauty of the marine environment in Santa Monica Bay is of special concern to me.</p> <p>I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.3.
240.02	Redondo Beach's Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a	Please see Master Response 2.3.

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	<p>megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.</p>	
240.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, saline, a spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	Please see Master Responses 2.1 and 2.4.

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Letter and Comment Number	Comment	Response
240.04	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Response 2.4.
240.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
240.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p>	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	<p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6, and 8 are richly deserving of retirement to allow the park and restoration plans to proceed apace.</p>	
241.01	<p>I'm writing to oppose the extension of the AES power plant in Redondo Beach. We are located near the power plant and purchased our property under the belief that the plant would be retired at the end of this year as previously approved. We strongly oppose the extension of the power plant as it's unnecessary and it places all of us in close proximity to the power plant at risk of inhaling fine particulate matter. Please put yourself in our shoes and act like your family lives near this outdated plant that puts everyone's health at risk. Retire the plant this year!</p>	Please see Master Responses 2.1, 2.2, and 2.5.
242.01	<p>Writing to oppose any effort to extend the Redondo AES power plant's operations. No</p>	Please see Master Responses 2.1 and 2.2.

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	<p>extensions. Please shut it down as scheduled at the end of the year.</p>	
243.01	<p>I am in extreme opposition of allowing the Redondo Beach Refinery to stay open another 3 years!</p> <p>The pollution is causes, the harming of our ocean life and the incredible eye-sore that it is needs to finally be stopped and eliminated! I am born and raised in the south bay and have been staring at it for over 50 years. But the fact that you have allowed it to stay open this long is shameful! It needs to STOP!</p> <p>PLEASE PLEASE PLEASE honor the original agreement of it shutting down this year. The community will be forever changed for the better once it is gone!!!</p>	Please see Master Responses 2.1, 2.2, and 2.3.
244.01	<p>I am opposed to any operating extension for the AES power plant operating in Redondo Beach.</p> <p>The damage being done to marine life by OTC plant's is well known should be mitigated at the earliest opportunity.</p>	Please see Master Responses 2.1, 2.2, and 2.3.
244.02	<p>A survey of regional providers quickly reveals the AES plant in Redondo is not currently</p>	Please see Master Response 2.2.

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	needed for grid reliability and therefore surplus.	
244.03	The California Coastal Commission has acknowledged the area of the plant as a California Wetland resource. The sooner conservation of the wildlife, marine life along with mitigation of the pollution expelled by the plant the better for the public health and environmental resources.	Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5.
245.01	<p>After moving here from the East Coast 15 years ago, the first eyesore I witnessed and, sadly, continue to see on a daily basis, is the power plant in Redondo Beach (units 5, 6 & 8).</p> <p>Since my move, I have learned that, in addition to the visual blight on our sublime coastline, the plant is inefficient, a danger to marine life, located on historic Salt Lake wetlands, and located in one of the most densely populated areas along the California coast.</p> <p>The AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous and does not reflect the will of South Bay citizens.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.4.

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Letter and Comment Number	Comment	Response
	OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.	
246.01	As a California resident, I opposing any extension for the AES power plant to operate. Close it now.	Please see Master Responses 2.1 and 2.2.
247.01	We would like to see the AES plant closed by December 2020, as scheduled.	Please see Master Responses 2.1 and 2.2.
248.01	We are residents of Redondo Beach and we are opposing the extension for AES. Please DO NOT extend. Our city needs to move forward in developing what's best for our residents - that's why we chose to live here in Redondo Beach. Our Redondo Beach residents need to breathe clean air.	Please see Master Responses 2.1 and 2.5.
249.01	As a resident of Redondo Beach CA (90277), I am in strong opposition to any extension of Redondo Beach power plant. Aside from the basic eye sore, the plant continues to emit soot, nitrous oxides, sulfur oxides and fine particulate emissions into my neighborhood every time it operates.	Please see Master Responses 2.1, 2.2, and 2.5.

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	<p>Technology, demand and resources have changed since its construction. It's time we adapt to the 21 century and move on. And try to fix some of the mistakes made for future generations.</p>	
250.01	<p>Please do not extend the operations at the AES power plant. I know the California Water Resources Board is required to protect public health. For years we have lived in the air pollution and the micro particles (Particulate matter) produced by this gas fired power plant. The toxic plume coming from the AES REDONDO BEACH smokestacks is invisible (on most days to the naked eye) but, do not be fooled, it is a toxic cocktail that does not have time to dissipate before entering into our lungs. Please consider the air quality in our area in addition to water quality. It's time to retire this plant once and for all because of it's proximity to a highly dense population.</p> <p>I've read your mission statement...</p> <p>Mission Statement</p> <p>To <u>preserve, enhance, and restore the quality of California's</u> water resources and drinking water <u>for the protection</u> of the environment, <u>public health</u>, and all beneficial</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations	
251.01	It NEEDS TO GO. Don't let this new greedy buyer or the AES suits convince you that it needs to stay. Please help out the families of Redondo Beach and vote no.	Please see Master Response 2.1.
252.01	I am adamantly opposed to issuing any extension of the closure date for the outdated AES power plant in Redondo Beach. The decision to close that plant was made ten years ago which allowed plenty of time to appeal the decision and when that failed to prepare for closure. Please do not allow an extension of this time frame. Now is the time to remove this outdated and polluting power plant from this heavily populated region of the California coast.	Please see Master Responses 2.1, 2.2, and 2.5.
253.01	"Through the Porter-Cologne Act, the State Water Board and the Regional Water Boards have been entrusted with broad duties and powers to preserve and enhance all beneficial uses of the state's immensely complex waterscape. The Porter-Cologne Act is recognized as one of the nation's strongest pieces of anti-pollution legislation, and was so	Please see Master Responses 2.1,2.2 and 2.3.

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	<p>influential that Congressional authors used sections of the Act as the basis for the Federal Clean Water Act.</p> <p>The late SWRCB chairman, Don Maughan, wrote: The State Water Board has never had the luxury of advocating protection of just one water need, such as the environment or agriculture or that of large cities. Our charge is to balance all water needs of the state. Some call it a superhuman task, but through the years this Board, aided by its excellent staff, has done what I call a superhuman job of accomplishing that mandate despite the intensive [please note >>> "historical, political, and economic pressures" <<] that always accompany California water issues." Wikipedia</p> <p>YOU ARE ABANDONING YOUR ORIGINAL MISSION!!</p>	
253.02	<p>Redondo Beach residents HAVE HAD ENOUGH NOISE and POLLUTION for years and we need to SAVE ourselves and our coastlines from TONS OF PARTICULATES PERYEAR!!!!!! We deserve better! As none of you most likely do not live nearby, it's clear to see why you are not concerned.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.</p>

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	DO THE RIGHT THING!!!	
254.01	We need to close the AES plant as originally scheduled in 2020. As a lifelong runner I look forward to the time when I can rely on excellent air quality in our beach communities. Redondo Beach, Hermosa Beach and Manhattan Beach are too densely populated to have this polluter in our neighborhood.	Please see Master Responses 2.1, 2.2, and 2.5.
255.01	I'm a resident of Redondo beach and I ask you to please not extend the time for the plant to shut.	Please see Master Responses 2.1 and 2.2.
255.02	We raised kids here and demand to have clean air for them.	Please see Master Responses 2.1 and 2.5.
256.01	<p>I respectfully request the current Power Plant is not allowed to be extended beyond the 31 December 2020.</p> <p>It is extremely important that this area be completely refurbished in order to preserve the beautiful marine life and habitat that we are still able to enjoy.</p> <p>If we have learned anything from the ongoing COVID 19 impacts, it is the fact that with a little care, investment, and consciousness that entire marine life and habitat can greatly</p>	Please see Master Responses 2.1, 2.2, and 2.3.

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	benefit, and as such so will the quality of life our children we leave behind will have for their future families.	
257.01	I have suffered through the pollution and periodic steam releases (high pitch scream usually in the middle of the night) since then so have been counting the days until the mandatory shut down by law in 2020 takes place.	Please see Master Responses 2.1, 2.2, and 2.5.
257.02	<p>Based on everything I have read there is no justification to leave it open for another three years as I have yet to see clear data or evidence that it is needed for 'backup'.</p> <p>It is time to move on from this archaic technology and transition to more sustainable, environmentally friendly sources of energy. The next generation (I have a son in college) is demanding it so we need to get with the program.</p>	Please see Master Responses 2.1 and 2.2.
258.01	Please do NOT extend the operating term of the AES Redondo Beach Power Plant beyond the current date set for its termination. It has polluted the air and water of Redondo Beach coastline for far too many years. I have lived and do live in Redondo Beach for thirty-seven	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	<p>years and did live in Hermosa Beach for six years before that. All of these years have been spent suffering from some manner of pollution from this plant.</p> <p>It is time to let this plant expire. We the residents have been looking forward to this cessation of pollution for a long time.</p>	
258.02	<p>Do not be deceived by whatever promises controlling entities of the plant may make. They are most probably all lies intended to gain extra profit from the continuation of operation of this plant.</p> <p>It is not needed. It is not wanted.</p> <p>Honor the agreement for non-operation made ten years ago.</p>	Please see Master Responses 2.1 and 2.2.
259.01	<p>I'm sending this letter to oppose the extension of the AES power plant past the 12/31/2020 deadline put in place 10 years ago, voted by the citizens of Redondo Beach majority! I am aware that this will come up to your vote in July and I hope you do the right thing by the Redondo Beach Citizens who unanimously want this power plant out and onto what we</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	<p>were promised in 2010. Enough is enough please do the right thing for our community.</p>	
260.01	<p>Hello, I am requesting the life of AES Redondo powerplant to NOT be extended beyond December 2020.</p> <p>AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most poluting per kilowatt of any coastal plant still running.</p> <p>AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.</p>	Please see Master Responses 2.1, 2.2, and 2.5.
260.02	<p>There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).</p>	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
260.03	<p>Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that its operating life not be extended.</p> <p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	Comment noted. Please see Master Response 2.2.
261.01	<p>I'm opposing to any extension to the retirement of the AES power plant in Redondo Beach California, for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gasfired generator at the AES power plant.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	<p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
261.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Comment noted. Please see Master Responses 2.1 and 2.5.

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261.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
261.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.

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	is all at the expense of the residents of Redondo and Hermosa.	
261.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
261.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.2 and 2.4.
261.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
261.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
262.01	For the safety of our family and community, as well as our oceans, my family vehemently opposes the proposed extension for the AES power plant in Redondo Beach. We are in	Please see Master Responses 2.1, 2.2, and 2.3.

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	support of the planned retirement December 31,2020.	
263.01	Get rid of this eye sore!!!!	Please see Master Responses 2.1 and 2.2.
264.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Please see Master Responses 2.1 and 2.2.
264.02	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Please see Master Response 2.3.
264.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.

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	<p>California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	
264.04	<p>The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”</p>	Please see Master Response 2.4.
264.05	<p>And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are</p>	Please see Master Response 2.2.

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	<p>speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.</p>	
264.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state's economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p> <p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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	of retirement to allow the park and restoration plans to proceed apace.	
265.01	<p><u>I'm writing to you in opposition to extending the operational life of the gas-fired AES power plant in Redondo Beach, CA.</u></p> <p>I've lived in Hermosa Beach since 1962, most of that time within 1/2 mile of the AES plant. I'm 81 years old. Along with family members and some of my neighbors I've had to deal with asthma for much of the last 58 years. Studies have shown that asthma is exacerbated by the particulate matter that emanates from the AES plant.</p> <p><u>The plant is scheduled to cease operations on December 31,2020. Let's keep it that way.</u></p> <p>A recent study conducted by the City of Hermosa Beach determined that even if the plant is operating at only 5% capacity it is <u>the major source of the fine particulate matter in the area.</u></p> <p>The City of Redondo Beach and City of Hermosa Beach, along with the Beach Cities Health District, unanimously oppose granting an extension of operations to the plant. The Hermosa Beach and the Redondo Beach</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.

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	<p>School Boards also unanimously oppose any extension.</p> <p><u>Please put an end to the plant's operation. The power isn't needed, and the plant isn't wanted.</u></p>	
266.01	<p>I urge you to close the Redondo Beach AES power plant at the end of this year. 10 years ago your board voted to end the plant's operation this year and now you are considering extending it for three more years. The power plant pollutes the air and the ocean and needs to go this year.</p>	<p>Please see Master Responses 2.1, 2.3, and 2.5.</p>
267.01	<p>As a forty year, highly engaged resident, homeowner, executive engineer and taxpayer of our South Bay Beach Cities (Redondo, Hermosa and Manhattan Beaches), I implore you to vote firmly AGAINST any extension of the currently required 12/31/2020 retirement of the AES powerplant in Redondo Beach. So many of us long term local residents have worked and fought incredibly hard for many, many years to finally achieve the end result of the legislated closure of this greatly outdated, poorly maintained, and environmentally unsound facility.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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267.02	For you, or any appointed or elected administrative board, to now reconsider this agreed upon, legislated, and long awaited end goal not only belittles the sincere and enduring public effort that went into its creation, but calls into very serious question your personal definition of, and true commitment to 'public service'.	Please see Master Responses 2.1 and 2.2.
267.03	<p>You're undoubtedly seeing the following bullet points in numerous letters like mine, but as a deeply engaged resident and engineering professional with first hand research, experience and knowledge of the facts supporting each and every one of these bullet points (and many, many more), I too shall include them here for your reference. I would hope your own research and due diligence on this matter has resulted in you not needing yet more convincing. But just in case not, please give serious consideration to the following:</p> <p>The City of Hermosa Beach, City of Redondo Beach, the Hermosa Beach School Board, the Redondo Beach School Board, and the Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES powerplant.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
267.04	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa Beach and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.

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267.05	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in Redondo Beach, Hermosa Beach, and surrounding communities will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
267.06	A consortium of private parties recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and the restoration of wetlands. But now, AES and the new owner are going to benefit financially if the	Comment noted. Please see Master Response 2.1 and 2.2.

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	plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo Beach, Hermosa Beach, and surrounding communities.	
267.07	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
267.08	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat both for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Response 2.2 and 2.4.
267.09	Unexpectedly, the retirement dates of three other large power plants in this area are already being extended. AES Redondo is NOT needed for grid reliability.	Please see Master Response 2.2.
267.10	As the LA Times reported, California has a big, and growing glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
267.11	<p>Thank you for your service, and for giving your utmost attention to this this matter that is so critical to the health and safety of our community. We look forward to your vote to deny any extension, and instead uphold the existing, legislated requirement to retire the Redondo Beach AES power plant by 12/31/2020.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
268.01	<p>Pupa Family would love to see the AES shutted down. We are ingesting too much pollution and this is not good for our health.</p> <p>Plus having the AES plant shutted down, we will have a better property value, no doubt about it.</p>	<p>Please see Master Response 2.1 and 2.5.</p>
269.01	<p>I am a Redondo Beach resident and I oppose the extension of operations of the AES power plant.</p> <p>The plant produces toxic air pollution, carbon emissions and noise pollution. Its also an eye sore and needs to go. This is harmful to all the local residents in the surrounding areas. Its also a harm to all the marine and plant life in the area. I would prefer to see the area returned to a coast wetlands area.</p>	<p>Please see Master Responses 2.1, 2.3, 2.4, and 2.5.</p>

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
270.01	I am a resident of Redondo Beach and I don't want the AES power plant to extended past December 2020.	Please see Master Responses 2.1 and 2.2.
271.01	<p>As a taxpayer and resident of Redondo Beach, my family and I would like you to adhere to the original agreement and cease operations of AES Redondo by 1/1/2021.</p> <p>This plant spews toxic gasses in the air that come directly into my house which overlooks the plant. On multiple occasions I have been forced to close all my doors and windows to try and slow the noxious odors from entering my home. My daughter complains of headaches which we believe are in part due to the plant and fumes.</p> <p>This has been on the books since 2010 and now more than ever we owe it to our young people to tell the truth and keep our word.</p>	Comment noted. See Master Responses 2.1, 2.2, and 2.5. Additionally, the compliance date for Redondo Beach is December 31, 2020, and is proposed to be extended to December 31, 2021 to address grid reliability.
271.02	This plant is not needed to meet the excess capacity that CAISO and the CPUC have determined is necessary.	Please see Master Response 2.2.
271.03	This action would cause further environmental damage to the thousands of Redondo and	Please see Master Responses 2.1, 2.2, and 2.3.

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Letter and Comment Number	Comment	Response
	<p>Hermosa residents living in its shadow as well as marine life in and outside the Harbor.</p> <p>Thank you for doing the right thing.</p>	
272.01	<p>I'm requesting you to vote against extending operation of the Redondo Beach AES power plant. It needs to be permanently retired as scheduled. As Redondo Beach citizens, We have put up with this impact to our health and the health of our children and manipulation for greed long enough. I thank you for your time and consideration.</p>	Please see Master Responses 2.1 and 2.2.
273.01	<p>The request to extend the operating life of the Redondo Beach AES generating facility beyond the end date of December 2020 that was set 10 years ago should be rejected.</p> <p>In the very unlikely future scenario where a decision might be considered to activate generation, the renewed operation of this facility in such a densely populated area could never be justified, given the serious negative impacts in terms of health and quality of life due to pollution and noise, and in terms of unjustifiable ecological damage to sea life caused by the facility's 70-year-old technology,</p>	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	<p>all of which makes it a uniquely poor candidate for any future use.</p> <p>Please acknowledge the unanimous view of South Bay political leaders, and demonstrate a commitment to protecting the quality of life for the thousands of California citizens who are residents of the South Bay, by rejecting the proposal to extend the life of the AES generator in Redondo Beach.</p>	
274.01	<p>I oppose the proposed 3 year extension of the AES power plants scheduled shut down for the following reason...</p> <p>Its operation is a serious <u>health hazard</u>... especially for the youngsters in the densely populated communities near these AES giant smoke stacks.</p> <p>For decades this inefficient fossil fueled “dinosaur” has spewed cancer causing chemicals into youngsters lungs...</p> <p>It’s time to <u>stop</u> AES’s unnecessary power generation now... and give youngsters a chance to grow up with healthier lungs.</p> <p>By <u>rejecting</u> AES’s outrageous demands to spew toxic carcinogens for another 3 years...</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.</p>

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Letter and Comment Number	Comment	Response
	the Water Board will be doing the right thing to help protect everyone's health.	
275.01	I'm requesting you to vote against extending operation of the Redondo Beach AES power plant. It needs to be permanently retired as scheduled. As Redondo Beach citizens, We have put up with this impact to our health and the health of our children and manipulation for greed long enough. I thank you for your time and consideration.	Please see Master Responses 2.1 and 2.2.
276.01	<p>I certainly hope none of you think that if this outdated, unwanted behemoth isn't removed, that ALLLLL of you won't be personally investigated for the bribes or otherwise you have obviously received to keep it going.</p> <p>We know it's outdated.</p>	Please see Master Response 2.1. Additionally, the commenter has provided no basis for apparent claims that members of the State Water Board have been offered or have accepted bribes. State Water Board members are public officials within the meaning of the Political Reform Act (PRA) (Cal. Gov. Code § 81000 et seq.) The PRA requires annual disclosures of financial interests held by the public official and prohibits public officials from making, participating in making or in any way attempting to use his or her official position to influence a governmental decision in which the public official has a financial interest. (Cal. Gov. Code § 87100.) Receipt of anything of value from a person or party with an interest in a proceeding is clearly within this prohibition.

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276.02	We know it isn't necessary or even terribly useful.	Please see Master Response 2.2.
276.03	<p>We know it emits toxic particles.</p> <p>We know it is an eyesore.</p> <p>So why is it still here? If it continues, I will personally devote the next 2 years to finding out exactly how you were bribed, and bring you to justice.</p>	Please see Master Response 2.5 and response to comment 276.01.
277.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Please see Master Responses 2.1 and 2.2.
277.02	Redondo Beach's Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in "potential impacts	Please see Master Response 2.3.

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	to marine life,” according to the 2010 Final SED.	
277.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.
277.04	The staff report itself recognizes that “if the power plant’s compliance date is extended	Please see Master Response 2.4.

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Letter and Comment Number	Comment	Response
	beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	
277.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
277.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p> <p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p>	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.	
278.01	I am a Redondo Beach CA resident and writing to let you know that my family and I are looking forward to the timely closure of the Redondo Beach AES Power Plan by Dec 31, 2020. We are tired of the thick black smoke and particles that invade our windows screens overnight. Air pollution is a health hazard and causes among other things lung illness.	Please see Master Responses 2.1, 2.2, and 2.5.
279.01	In all those years we have been saddened by the sight of (and knowledge about) the AES power plant. It has been and continues to be a blight on Redondo Beach and the South Bay as a whole. I and my entire family were extremely pleased when we learned that the AES power plant was to be formally retired and we are eagerly awaiting the day when it can be torn down and the property on which it now sits can be put to far better and more productive use. It has come to my attention that the Water Resources Control Board is considering	Please see Master Responses 2.1 and 2.2.

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	<p>a continuance of the planned retirement of the power plant for an additional one to three years.</p> <p>I believe that would be an extremely unfortunate mistake and I strongly urge you to not go forward with the proposed extension/continuance.</p>	
279.02	<p>Even at 5% production, I understand that the AES power plant has been the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. The outdated, gas-fired generator at the AES power plant creates an extraordinarily large amount of particulate pollution each year and it endangers the health of myself, my wife, our two daughters, my brother and his family, and every other person who calls the South Bay their home.</p> <p>Without any doubt air quality in the South Bay (and especially in Redondo Beach) will improve significantly when the plant is permanently closed and the health of all members of the public will benefit as a result.</p>	Please see Master Response 2.5.

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279.03	<p>It is my understanding that a private party recently purchased the property with the aim of redevelopment while the City of Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment in a way that will maximize open space and public uses such as a park, and restore wetlands. It appears that now, however, AES and the new owner seek to extend the time during which the plant can remain in operation. While I will not opine on their motives, one thing is clear, such an extension would be at the profound expense and would greatly disadvantage the residents of Redondo Beach and Hermosa Beach, among others who live in and enjoy the South Bay.</p> <p>Once again, I urge you in the strongest possible terms to vote against this extension request and let us move forward in taking advantage as soon as possible of this historic opportunity to bring about significant positive change in our community.</p>	Please see Master Responses 2.1 and 2.2.
280.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
280.02	<p>AES Redondo is a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still running.</p> <p>AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four sides of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all three of the other power plants combined.</p>	Please see Master Responses 2.1, 2.2, and 2.3.
280.03	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, but the City of Redondo Beach had a deal with the owner of the plant to purchase half of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1, 2.2, and 2.4.
280.04	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that its operating life not be extended.	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	
281.01	<p>As a property owner, tax payer and life long resident of Redondo Beach, I want to send you a note to OPPOSE extending the use of the AES power plant for an additional year of use beyond its scheduled retirement date of December 2020.</p> <p>The pollution it spews into the community which is quite dense in population is reason enough. The residents of Redondo Beach have been consistent in their voiced concern and desire to retire the plant.</p> <p>Please let the plant retire as scheduled and deny any amendments that would keep it operable past December 2020.</p>	Please see Master Responses 2.1, 2.2, and 2.5.
282.01	We oppose any extension of operations for the closure of the AES Plant for these reasons:	Comment noted. Please see Master Responses 2.1 and 2.2.

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	The plant is deteriorating. Walking around the plant, one can see walls are crumbling, glass is broken. We would assume that based on this and the age of the plant, crucial mechanics and structure inside are outdated and unsafe.	
282.02	The plant is unsafe for the nearby residents. Multiple times each year, deafening and scary blaring noises roar across adjacent neighborhoods. In addition, air particles are produced by the plant which certainly are not good for the human body. Thousands of Hermosa Beach and Redondo Beach residents live near the AES Plant, including hundreds right across the street.	Please see Master Responses 2.1 and 2.5.
282.03	<p>The plant destroys marine life. Our understanding is that the AES Plant's lack of technology regarding marine life safety would not be allowed by today's power plant regulations.</p> <p>I hope you will choose to close the AES Plant on the agreed upon closure date at the end of 2020.</p> <p>Thank you for your consideration.</p>	Please see Master Responses 2.1, 2.2, and 2.3.
283.01	I respectfully write to express my opposition to the proposed extension of operations at the	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	AES Redondo Beach pier plant located at 1100 North Harbor Drive in Redondo Beach. I would like the State Water Resource Control Board vote no on the proposed extension.	
284.01	<p>Since I was a child, the AES power plant has been a travesty and eyesore. Not only is it out of place in our beautiful beach community, it wrecks havoc on our environment. As a community we have been looking forward to its retirement for some time. An extension of its life would be a huge disappointment to the local community and a win for special interests.</p> <p>The plants time is up. I urge you to oppose the extension.</p>	Please see Master Responses 2.1 and 2.2.
285.01	I am a Redondo Beach resident and homeowner who opposes any extension to the local AES power plant. Redondo Beach citizens and neighboring beach cities Hermosa Beach and Manhattan Beach are all in agreement that the plant should close down as expected by December 2020. We have many young families in the beach cities and want a clean and safe environment to raise our children.	Please see Master Responses 2.1 and 2.2.

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286.01	I am opposed to the extension of the AES plant beyond its previously scheduled date of 12/31/2020.	Please see Master Responses 2.1 and 2.2.
286.02	It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.	Please see Master Responses 2.1 and 2.5.
286.03	The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
286.04	A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.	Please see Master Response 2.5.
286.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize	Please see Master Response 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
286.06	They are already, unexpectedly extending the retirement date of three other large powerplants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
286.07	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
287.01	This email is to express my opposition to any extension of the AES Redondo Beach powerplant.	Please see Master Responses 2.1 and 2.2.
288.01	I oppose any extension to the AES power plant.	Please see Master Responses 2.1 and 2.2.
288.02	The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
288.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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	the plant, the harm to marine life, and the impact on property values.	
288.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
288.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the	Please see Master Responses 2.1 and 2.2.

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	new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
288.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
288.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.1 and 2.4.
288.08	They are already, unexpectedly extending the retirement date of three other large powerplants in this area. We don't need AES Redondo for grid reliability.	Please see Master Responses 2.1 and 2.2.
288.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
289.01	I firmly believe that the discussion about the AES power plant in Redondo Beach has gone	Please see Master Responses 2.1 and 2.2.

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	on long enough. Plans have been made to eliminate this Once-Through-Cooling plant and provide new facilities that are much more in line with the desires of the local population.	
289.02	I believe that NO AMENDMENT to extend the life of a plant is acceptable that provides no benefit locally but generates a lot of pollution and aggravation.	Please see Master Responses 2.1, 2.2, and 2.5.
289.03	This plant has exceeded its beneficial lifetime and should be terminated.	Please see Master Response 2.2.
290.01	I wholeheartedly agree with Mayor Brand that the AES plant needs to go. Here is his latest editorial that describes why.	Please see Master Responses 2.1 and 2.2.
291.01	I am a Redondo Beach resident and the plant must be shut down by the end of the year.	Please see Master Response 2.1.
292.01	I urge you not to extend the life of the AES Power Plant past the agreed upon date of December 31, 2020.	Please see Master Responses 2.1 and 2.2.
292.02	The additional power is not necessary to secure our grid based on the lower cost of renewables and the reduction in energy use during COVID19.	Please see Master Response 2.2.

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292.03	We will not be going back to “normal”, an unsustainable burning of fossil fuels which risks air and water quality and viability of life as we know it due to climate change.	Please see Master Responses 2.2, 2.3, and 2.5.
292.04	The density around the AES plant is completely incompatible with operation of a powerplant and if it wasn't for greed it would have been shut down years ago.	Please see Master Responses 2.1 and 2.2.
292.05	Please listen to the community which has been working for years to establish a wetlands on the property along with other uses.	Please see Master Responses 2.1 and 2.4.
293.01	I am a Redondo Beach resident, and I am opposed to the extension of the AES power plant operation.	Please see Master Response 2.1.
293.02	It currently runs at limited capacity to where its contribution to the grid will not be missed, it is a blight on the community, and we need to stick to the original plan of closure by end of 2020 so this community can move forward with preferred revitalization.	Please see Master Responses 2.1 and 2.2.
293.03	The community needs to focus on working with the new property owner, developing the area into partial park and open community, and	Please see Master Response 2.1.

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	supplement this beach community with fresh ideas.	
293.04	The power plant emits gases and polluted particles throughout the community, and its relevant time has come to an end.	Please see Master Responses 2.1 and 2.5.
294.01	The plant has never been fully operational but just enough to cause episodic pollution and use old technology damaging the local ecosystem. I strongly oppose keeping the plant open for a further 3 years only for the benefit to the buyer and not accounting for the cost to the environment and the local population who will get only pollution in return.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
294.02	It is unjust that big corporations and buyers constantly can manipulate the standards that have been hard fought to protect the environment can be so casually overturned.	Please see Master Responses 2.1 and 2.2.
294.03	I hope this will not be the case and Redondo Beach can be example of integrity and insist on the rightful closing of the plant as agreed upon with the coastal commission.	Please see Master Responses 2.1, 2.2, and 2.5.
295.01	The plant has never been fully operational but just enough to cause episodic pollution and use old technology damaging the local ecosystem. I strongly oppose keeping the plant	Please see Master Responses 2.1, 2.2, and 2.5.

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Letter and Comment Number	Comment	Response
	open for a further 3 years only for the benefit to the buyer and not accounting for the cost to the environment and the local population who will get only pollution in return.	
295.02	It is unjust that big corporations and buyers constantly can manipulate the standards that have been hard fought to protect the environment can be so casually overturned.	Please see Master Responses 2.1 and 2.2.
295.03	I hope this will not be the case and Redondo Beach can be example of integrity and insist on the rightful closing of the plant as agreed upon with the coastal commission.	Please see Master Responses 2.1 and 2.2.
296.01	The AES Redondo Beach power plant received a death sentence 10 years ago. I understand this appeal to the State Water Board is equivalent to a Hail Mary pass for a stay of execution, but insufficient evidence is being presented to justify a delay.	Please see Master Responses 2.1 and 2.2.
296.02	Our community – indeed, the state of California – is succeeding in its conservation efforts and construction of alternative power generators, removing the need for obsolete, environmentally caustic electricity producers like the gas-fired AES Redondo Beach facility. I believe the power plant’s minuscule,	Please see Master Responses 2.1 and 2.2.

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	needless output justifies its immediate retirement – but I’m willing to wait until December 31, 2020.	
296.03	Our well-deserved reward will be the removal and environmental cleanup of a long-standing polluter in the South Bay and the return of coastal wetlands.	Please see Master Responses 2.1, 2.2, 2.4, and 2.5.
296.04	I won’t miss the billowing black clouds spewing from the plant nor the headache triggering loud whistles. The only downside to decommissioning the AES Redondo Beach power facility will be the possible destruction of the Wyland whale wall. Beyond that, it’s all good.	Comment noted. Please see Master Responses 2.2 and 2.5.
296.05	We’ve all had plenty of time to prepare for the planned decommissioning. Please allow the power plant closure to continue as planned for December 31, 2020.	Please see Master Responses 2.1 and 2.2.
297.01	Please do not extend the closing date of the Redondo Beach AES power plant past the December 31, 2020 date. It is a very ugly blight on an otherwise beautiful seaside view.	Please see Master Responses 2.1 and 2.2.
297.02	Plus when it is in use, which is rare, it makes a horrible loud explosive noise. The last time it went off I thought a bomb went off! It puts out	Please see Master Responses 2.1 and 2.5.

Table 5 – Comment Letters 200 to 299
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	dark grey clouds of dust/ash that blows all over our area which then gets into our homes and our lungs! I live just a few blocks away.	
297.03	Close down this now useless power plant that is not really needed for the power grid reliability and let us turn the area into a much needed parkland.	Please see Master Responses 2.1 and 2.2.
297.04	Help us restore our coastal wetlands and improve the ocean water quality.	Please see Master Responses 2.1 and 2.3.
297.05	Help us welcome back our native flora and fauna and provide a habitat for migrating birds. Thank you.	Please see Master Responses 2.1 and 2.4.
298.01	Please retire the AES Redondo Beach power plant as scheduled by 12/31/20.	Please see Master Responses 2.1 and 2.2.
298.02	I've been an RB resident for years and will never get used to this eye sore that is a stain on our coastline and creates air and noise pollution. The huge power lines are also awful to look at and a giant waste of precious land.	Please see Master Responses 2.1 and 2.5.
298.03	Make good on your commitment. No three year extension!	Please see Master Responses 2.1 and 2.2.
299.01	I am a resident of Redondo Beach and wanted to express my opposition to any plan to	Please see Master Responses 2.1 and 2.2.

Table 5 – Comment Letters 200 to 299
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	continue operations of the AES Redondo Beach power plant beyond the current retirement date of December 31, 2020.	
299.02	There is no justification for continued operation of this plant. There is no justification for continuing to allow this plant to operate in light of the environmental impact on Redondo Beach and South Bay residents. There is no need to continue generation at this plant when studies show that the capacity of AES Redondo Beach is not needed today or in the future.	Please see Master Responses 2.1 and 2.2.
299.03	It is time to shut down this plant, at the end of 2020 as scheduled. NO EXTENSION SHOULD BEGRANTED IN THIS CASE.	Please see Master Response 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
300.01	Please keep to the agreement of shutting the AES power plant down by this December 31.	Please see Master Responses 2.1 and 2.2.
300.02	The plant is an eyesore and a nuisance. We are tired of the plant's loud noises, its thick black smoke, and most importantly, the air contaminants emissions that cause lung illness.	Please see Master Responses 2.1 and 2.5.
301.01	I am a Redondo Beach lifelong resident of 50 years and live right in the path of windblown smut from this over polluting cement smoke box, to which must end. The desire for our city majority is to see the health and wellbeing of everyone and it will be enhanced greatly by the demise of the old powerplant that has outgrown it's need. Shut it down.	Please see Master Responses 2.1, 2.2, and 2.5.
302.01	I support the Hermosa Beach and Redondo Beach unanimous vote to oppose the extension. It's time to retire the AES power plant per the agreement 10 years ago. I oppose the extension.	Please see Master Responses 2.1 and 2.2.
303.01	Im writing to demand that the life of AES Redondo power plant not be extended beyond December 2020.	Please see Master Responses 2.1 and 2.2.
303.02	For 10 years, the 1950s-technology AES Redondo power plant has been scheduled to cease operations at the end of this year. It is the most-polluting and least efficient of the four coastal power plants ordered	Please see Master Responses 2.1, 2.2, and 2.3

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	to cease by the California State Water Resources Control Board (the “Water Board”).	
303.03	Although the power plant rarely produces electricity, and does not provide power directly to Redondo Beach or the South Bay, it still pumps hundreds of tons of poisonous gas and dangerous particulate into our air every year. Its ocean-water cooling system kills enormous amounts of marine life as well.	Please see Master Responses 2.2, 2.3, and 2.5.
303.04	Despite no evidence of the need for AES Redondo to stay open for grid reliability, I understand that the AES Corporation is pushing for a 3-year extension to the powerplant’s life. Such an extension would give AES tens of millions of dollars in profit at the expense of South Bay residents’ health.	Please see Master Responses 2.1, 2.2, and 2.5.
303.05	Since we are a mere 4 blocks away, I worry for my health and that of my family, friends and neighbors if this plant remains open.	Please see Master Response 2.5.
303.06	It is essential to the health and well being of the community and environment that the AES Redondo power plant be closed at the end of this year as scheduled.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
304.01	Please close AES on its agreed upon date. So Redondo Beach can get rid of the eyesore. And put	Please see Master Responses 2.1 and 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	some things there that have more importance in people's lives. Nature, a park, gatherings.	
305.01	If we don't need the plant, and currently, marine life is already threatened by other human wastes and runoff from the Palos Verdes Peninsula, let's just shut this thing down and move on.	Please see Master Responses 2.1, 2.2, and 2.3.
306.01	As a local resident of Redondo Beach I beg of you to put our health above all other consideration and do the right thing and close that unnecessary guzzling power plant.	Please see Master Responses 2.1, 2.2, and 2.5.
306.02	In fact just last night it was fired up and once again sounded like the dilapidated plant was about to blow up. Why do u not care or take the consideration of locals health into full consideration.	Please see Master Responses 2.1, 2.2, and 2.5.
306.03	Our children beg of you to look out for future generations and not a short sited 3 year extension of this 50+ year old plant that is all that is evil here in Redondo.	Please see Master Responses 2.1 and 2.2.
306.04	Being in the solar industry I know first hand we as humanity know better than this and you are the only ones to keep it on track and be removed as planned and approved for over a decade ago.	Comment noted. Please see Master Responses 2.1 and 2.2.
307.01	We are residents of the City of Redondo Beach and are writing regarding the proposal to extend the	Please see Master Responses 2.1 and 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	operation of the AES Redondo Power Plant for an additional period after the end of this year. The plant is currently scheduled to cease operations December 31, 2020, and we ask that you ensure that operations cease at that time and not be extended for all of the reasons listed below.	
307.02	The plant does not produce very much power, and the power it produces is not needed. As the Los Angeles Times reported, California has a big, and growing, glut of power. The LA Times found that the state’s power plants are on track to be able to produce at least 21% more electricity than California needs. They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don’t need AES Redondo for grid reliability.	Please see Master Responses 2.1 and 2.2.
307.03	The City of Redondo Beach, City of Hermosa Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District, Heal the Bay and Surfrider Foundation all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.	Comment noted. Please see Master Responses 2.1 and 2.2.
307.04	There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Redondo and Hermosa Beach, as well as the surrounding area. There are	Please see Master Response 2.1, 2.2, 2.3, and 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	<p>over 21,0000 people living within 1 mile of the AES powerplant. The residents of Redondo Beach and the Redondo Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
307.05	<p>A previous health impact study conducted by the City of Hermosa Beach found, even at 5%production, the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
307.06	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit</p>	Please see Master Responses 2.1 and 2.4.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
307.07	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
307.08	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.2, 2.3, and 2.4.
308.01	PLEASE CLOSE THE AES POWER PLANT IN REDONDO BEACH FOR GOOD!!!!!! DO NOT EXTEND THEIR RETIREMENT.	Please see Master Responses 2.1 and 2.2.
308.02	IT ONLY PLACES \$\$\$ IN THE POCKETS OF THE NEW LANDOWNER AS WELL AS THE POWERPLANT.	Comment noted. Please see Master Response 2.1.
308.03	AS RESIDENTS OF REDONDO BEACH, WE HAVE BEEN VOTING FOR YEARS TO RID OUR CITY OF THAT GIANT POLLUTER AND EYESORE!!!!!! PLEASE MAKE OUR DREAM A REALITY FOR US, OUR CHILDREN, AND OUR GRANDCHILDREN.	Please see Master Responses 2.1, 2.3, and 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
309.01	The plant is scheduled to cease operations 12/31/2020. Comply with the agreement to close made 10 years ago.	Please see Master Responses 2.1 and 2.2.
309.02	There are 21000 people living within one mile of the plant. This is a health and environmental concern. The plant is no longer needed.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3 and 2.5.
310.01	We wholeheartedly oppose any extension of the AES power plant, as does our family, neighbors, school friends, local and regional nonprofit environmental groups...pretty much anyone we speak with in the South Bay. We all want to move forward at this point. The plant is schedule to cease operations 12/31/2020, and we strongly ask that you ensure that operations cease then.	Please see Master Responses 2.1 and 2.2.
310.02	The AES power plant is the largest source of fine particulate pollution in the area.	Please see Master Response 2.5.
311.01	AES Redondo s a gas-fired, 1950s-technology power generating station, the least efficient and most polluting per kilowatt of any coastal plant still running.	Please see Master Response 2.3.
311.02	AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES	Comment noted. Please see Master Response 2.1.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	Redondo, more than are living within that distance of all three of the other power plants combined.	
311.03	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase half of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1 and 2.2.
311.04	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.
311.05	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted. Please see Master Response 2.1.
312.01	I am a resident of Redondo Beach and am requesting, along with many others, that the AES	Comment noted. Please see Master Responses 2.1 and 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	Redondo power plant cease operations by December 2020.	
312.02	It is the most-polluting and least efficient of the four coastal power plants ordered to cease by the California State Water Resources Control Board.	Please see Master Responses 2.3 and 2.5.
312.03	Although the power plant rarely produces electricity and does not provide power directly to Redondo Beach or the South Bay, it still pumps hundreds of tons of poisonous gas and dangerous particulate into our air every year.	Please see Master Responses 2.2 and 2.5.
312.04	Its ocean-water cooling system kills enormous amounts of marine life as well.	Please see Master Response 2.3.
312.05	There is no need for AES to stay open for grid reliability.	Please see Master Response 2.2.
313.01	For the safety of our family and community, as well as our oceans, my family vehemently opposes the proposed extension for the AES power plant in Redondo Beach. We are in support of the planned retirement December 31, 2020.	Please see Master Responses 2.1, 2.2, and 2.3.
314.01	The ancient AES power plant needs to be removed immediately. There is no good reason to extend the December 2020 deadline. It is a hazard to sea life and the people who live near it.	Please see Master Responses 2.1, 2.2, and 2.3.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
315.01	Please retire the AES Power Plant by December 31, 2020. It's a total eyesore for a beautiful city.	Comment noted. Please also see Master Responses 2.1 and 2.2.
316.01	PLEASE keep the December 31, 2020 deadline to shut down the AES power plant.	Please see Master Responses 2.1 and 2.2.
316.02	It is time to take down this dangerously toxic monstrosity, situated near some of the most densely populated cities in California.	Comment noted. Please see Master Responses 2.3 and 2.5.
316.03	Help South Bay marine life to heal and the people of the South Bay to breathe clean air again.	Please see Master Responses 2.3 and 2.5
316.04	Pave the way for the City to assuage the housing crisis and park deficit by replacing the plant with dearly needed residential units and public open space to share.	Comment noted. Please see Master Response 2.1.
316.05	Do the right thing: Make polluting companies stand by their agreements to phase out these sputtering dinosaurs.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
317.01	The land where the AES plant should be utilized for mostly outdoor living/recreational space and restore the Harbor area.	Comment noted. Please see Master Response 2.1.
317.02	Our infrastructure cannot handle more traffic, police/fire services, schools, etc.	Comment noted. Please see Master Response 2.1.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
317.03	If this is allowed to cater to big money interests, it will destroy the Harbor area.	Comment noted. Please see Master Response 2.1.
318.01	I am deeply opposed to extending the life of the dirty, polluting AES power plant in Redondo Beach.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
318.02	There's already an agreement in place for it to close by December of this year, and I see no valid reason whatsoever for trashing it so residents can be poisoned for three more years of profit for a multibillion-dollar corporation. You should make them honor the deal they made with us.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
319.01	Just a brief note to let you know I am completely opposed to the extension of the Power Plant in Redondo Beach. We need it to go off-line now! It does not need to be extended for three more years.	Please see Master Responses 2.1 and 2.2.
320.01	<p>As a 36 year resident of the South Bay, I am writing you today to please put the health, safety and well-being of tens of thousands of South Bay residents and visitors first and do not extend the operations of the outdated, polluting AES power plant in Redondo Beach.</p> <p>The plant is scheduled to stop operating on 12/31/2020 as per prior agreement between all relevant parties, including AES. Do not allow AES to break this agreement now, do not extend operations.</p>	Please see Master Response 2.1, 2.2, 2.3, and 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
320.02	There is broad support in the community to stop the operation, from surrounding South Bay city governments (Hermosa Beach, Redondo Beach, Torrance), environmental groups (Heal the Bay and Surfrider Foundation), the Beach Cities Health District and of course the tens of thousands of residents who have had to breath the toxic pollution that AES spews into the local communities for decades.	Please see Master Responses 2.1 and 2.5.
320.03	Even at its current low level of 5% operation, the power plant is the largest source of fine particulate matter and second in nitrogen oxide emissions in our community, per a City of Hermosa Beach health impact study. And in the era of Covid-19, we are finding that those with compromised breathing are at increased risk of health impacts and death. The pollution that AES spews into our air compromises our breathing, some more than others, but all of us to some extent.	Please see Master Responses 2.2 and 2.5.
320.04	Further, electricity that AES produces is not even necessary, per an LA Times report. California's power plants are estimated to produce at least 21% more electricity than we need in the future. The cost-risk-benefit is clearly against keeping the power plant operating. There is no benefit for the community, only health risks and environmental damage.	Please see Master Responses 2.2, 2.3, and 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
320.05	Finally, the impacts of global climate change are here now, making our planet less habitable day by day. We need to rapidly decarbonize our power grid and the out-of-date, highly polluting, fossil-fuel based, carbon emitting AES Redondo Power plant is a prime candidate to remove from the grid. It is not necessary.	Commented noted. Please also see Master Responses 2.2 and 2.5.
320.06	We can remove the power plant and restore the coastal wetlands, improving water quality and providing habitat for marine life, migratory birds and native species.	Please see Master Responses 2.1, 2.3 and 2.4.
320.07	It will replace a polluting carbon source with a life-rich wetland carbon sink, capturing and storing carbon. The science is clear, we are running out of time, we can no longer kick the can down the road.	Please see Master Responses 2.4 and 2.5.
321.01	The noise, rust spewing from the stacks and the horrible look from the rear of the plant needs to improve.	Comment noted. Please see Master Response 2.5.
321.02	This plant is a dinosaur with 1955 and 1967 technology. Please carefully consider the public that is apposed to the plant and rule for cleaner and healthier environment.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
321.03	This closure was agreed to happen at the end of the year. Let's demand AES keeps their promise.	Please see Master Responses 2.1 and 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
322.01	I am writing to encourage you to vote against any extension of operation for the AES Plant in Redondo Beach.	Please see Master Responses 2.1 and 2.2.
322.02	It pollutes the air and the water, it's noisy, it's ugly, and it's obsolete! We don't want it! Please do not consider extending their operation a day longer!	Please see Master Response 2.1, 2.2, 2.3, and 2.5.
323.01	<p>OPPOSED TO FURTHER EXTENSION OF AES POWER PLANT SHUTDOWN</p> <p>I am absolutely opposed to any further extension of the AES Redondo Beach Power Plant. As a homeowner in Hermosa Beach, I am gravely concerned about the continued delays and the inability of government to honor the voters decisions and shut this down to move on. I respect that this Power plant was here long before most of the surrounding cities but this I irrelevant – what is relevant is that a vote and decision to close the plant were made and government is not enacting the voters will.</p> <p>Please do not extend the shutdown date – it is time for this to move forward.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
324.01	Shut down plant as scheduled please.	Please see Master Responses 2.1 and 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
325.01	We do not want the AES power plant to continue operations in Redondo Beach.	Please see Master Responses 2.1 and 2.2.
325.02	We need that land for open space in our park starved area.	Comment noted. Please see Master Response 2.1.
325.03	In addition, the health hazards our residents have been forced to endure.	Please see Master Response 2.5.
326.01	After years of banter it's time to shut down the AES plant in Redondo Beach as formerly decided and approved.	Please see Master Responses 2.1 and 2.2.
326.02	The health effects of the AES plant upon the densely populated neighborhood is unacceptable.	Please see Master Response 2.5.
326.03	<p>Polluting the ocean waters from the AES plant is also unacceptable.</p> <p>The RWQCB is requiring that all cities stop the flow of storm waters into the ocean due to pollution.</p> <p>Does it make sense to keep the biggest polluter, AES, open?</p> <p>How much damage to the Pacific Ocean is acceptable? Answer: None.</p>	Please see Master Response 2.3.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
326.04	Please shut down the AES plant now to stop the air, water and particulate matter from killing human beings and the sea life in the ocean.	Please see Master Response 2.3 and 2.5.
326.05	Please abide by the U.S. Clean Water Act and previous decision to close it down and stop the extension of the AES plant now!	Please see Master Responses 2.1, 2.2, and 2.3.
327.01	Please close AES in 2020!!	Please see Master Responses 2.1 and 2.2.
328.01	The corona virus has given us a chance to change how we treat our environment and people in it.	Comment noted. Please see Master Responses 2.2, 2.3, and 2.5.
328.02	Please - Enough, its been 10 years of waiting. Be braver than you ever have and close this unnecessary plant.	Comment noted. Please see Master Responses 2.1 and 2.2.
329.01	We are sending this email to ensure that the life of the AES Redondo Power Plant is NOT extended beyond the originally contemplated date of December 2020.	Please see Master Responses 2.1 and 2.2.
330.01	I write today in strong opposition of any extension of the 2020 deadline for the Redondo Beach AES Plant to end OTC operations.	Please see Master Responses 2.1 and 2.2.
330.02	I address you as the Founding Organizer of the South Bay 350 Climate Action Group and I call your attention to the current <u>new record for CO2 levels just reached last week: 418 ppm</u> This is in addition to	Please see Master Response 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p><u>another record high temperature month in the hottest decade ever recorded.</u></p> <p>We are in a climate emergency that your board has a fiduciary obligation to acknowledge and respond to.</p> <p>In a world where 2C degrees of warming is the red line we must not cross globally, <u>Los Angeles County has already reached 2C degrees of warming.</u></p>	
330.03	<p>Our region is one of the most polluted areas in the USA. From the front porch of our house we can see the fossil fuel powered AES smoke stacks, the fossil fuel powered Scattergood Power Plant smoke stacks and the fossil fuel powered Clearway Energy smokestacks all of which spew greenhouse gases whenever their plant is operating. We are also within 10 miles of the Torrance refinery, the Chevron refinery, the Tesoro refineries and the Long Beach/LA Harbors all of which contribute to literally shoving carbon down our throats 24/7 at a time when we are already in the danger zone.</p> <p>The AES power plant is overdue to have its polluting and greenhouse gas producing operations ended for the health and safety of people who like to breathe.</p> <p>There is NO reasonable or responsible reason to keep this dirty and destructive fossil fuel burning</p>	Please see Master Responses 2.2 and 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	operation in business. Only climate change deniers would even propose doing so.	
330.04	Proven science and indisputable data all say the physical abuse of men, women and children from this power plant must end now.	Please see Master Responses 2.1, 2.2, and 2.5.
331.01	I oppose any extension to AES operations in Redondo Beach.	Please see Master Response 2.1.
331.02	<p>My family and I live within ~1/2 mile of the AES Redondo Power Plant. The smoke from the plant often passes directly over our house. The side of the house facing the plant is often coated with soot.</p> <p>I am very concerned about risks to my family's health due to the pollution from the AES plant.</p>	Please see Master Response 2.5.
331.03	I request that the original retirement plan be honored and that any additional power needs be supplied by more modern (less polluting) plants in less populated areas.	Please see Master Responses 2.1 and 2.2.
332.01	Our family is against any extension given to AES and the new ownership for continuing operations past the agreed upon expiration.	Please see Master Responses 2.1 and 2.2.
332.02	This is a main polluter and environmental hazard to the people and sea life.	Please see Master Responses 2.3 and 2.5.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
332.03	The fact that this is being labeled an extension due to power needs is not factual and goes against prior studies that have shown we have adequate power even without this plant operating.	Please see Master Response 2.2.
333.01	The AES Redondo power plant must be closed now! Absolutely no extension beyond December 2020.	Please see Master Responses 2.1 and 2.2.
334.01	It is my firm recommendation and support that the AES site be converted and developed as voted on with the outcome being a much needed and long anticipated PARK as reflected per the wishes of the voters.	Please see Master Response 2.1.
334.02	This area does not need a facility on this site when research dictates that more than adequate power capacity exists without the AES operation.	Please see Master Response 2.2.
335.01	I strongly urge you to protect marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago.	Please see Master Response 2.1, 2.2, and 2.3.
335.02	The Alamitos (Long Beach) and Huntington Beach facilities have largely been replaced already. At Alamitos, three of six units have already been taken offline. At Huntington Beach three of four have been decommissioned. The Redondo Beach facility is too	Please see Master Response 2.2.

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	<p>antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018.</p> <p>With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants for grid reliability will be reduced even further.</p>	
335.03	<p>Besides the damage to marine life, these plants damage public health and contribute to climate change. We desperately need a transition away from fossil fuels and that should begin by replacing these polluting power plants with power from renewable sources.</p>	<p>Please see Master Response 2.2, 2.3, and 2.5.</p>
336.01	<p>Please do not extend the operations of the subject plant. I have a clear view of the plant from my home. I can see the pollution and taste it in the air. It's one thing to run an efficient and necessary powerplant in the state. It is an entirely different situation to run an inefficient and unnecessary plant that pollutes and endangers the lives of so many people in our densely populated communities. Please just SHUT IT DOWN. The right time to do the right thing is NOW.</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
337.01	<p>Waterboard!!!</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>

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	<p>Please don't waterboard us for another 3 years. I've been waiting 35 years for this plant to close. Stop the bullshit and do your job.</p> <p>PLEASE CLOSE THE F_ _ _ _ _ POWER PLANT!!!!!!</p>	
338.01	<p>I write to urge the State Water Board to grant no compliance date extenuins beyond the December 31st, 2020 deadline for Redondo Beach units 5, 6 & 8 thereby requiring all powerplant generating units to be permanently retired at the time as stated in the Current OTC Policy.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>
338.02	<p>We residents even though very frustrated at times, have played by the rules, now demand the current owners do the same and cease operation.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
339.01	<p>I am a Redondo Beach resident and I oppose the extension of a lease to the AES Power Plant.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>
340.01	<p>I stand with the vast majority of Redondo Beach residents who are demanding the permanent retirement of this pollution-belching, unnecessary eyesore that remains a blight along our beautiful coast. The retirement date was agreed to ten years ago. That date is December 31,2020, and we expect that date to be met. Redondo Beach residents will never approve any extension to that retirement date—none--never, no way—and we obviously aren't</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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	interested in attempts to negotiate an extension, not by a single second.	
341.01	I've been a homeowner in Redondo Beach for almost 25 years, and the entire time I have been frustrated by the pollution and noise that the AES facility generates in a our otherwise peaceful residential coastal community.	Comment noted. Please also see Master Responses 2.1, 2.3, and 2.5.
341.02	In addition, I see AES repeatedly meddling in Redondo Beach politics, and misleading Redondo Beach residents by mailing them slick and manipulative propoganda that makes dubious claims and assertions, some of which I personally know to be untrue.	Please see Master Responses 2.1.
341.03	I consider AES to be a blight on both Redondo Beach and LA County, so the sooner they can be shut down, the better. I hope you stand firm on the closure date that AES already agreed to.	Comment noted. Please also see Master Responses 2.1 and 2.2.
342.01	I support to have the AES plant removed as soon as possible and not extend that out another 2 or 3 years.	Comment noted. Please also see Master Responses 2.1 and 2.2.
342.02	I have lived in Redondo Beach for over 35 years, and watched the area give up more and more of its potential park-open space. More than anything else, this city needs the open space to make the area more livable for everyone.	Comment noted. Please also see Master Responses 2.1.

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343.01	<p>The power plant may have served its community well in the past but has been deemed to be no longer needed, not only by the voters here in our city but by your advisory committee as well.</p>	<p>Comment noted. Please also see Master Response 2.2.</p>
343.02	<p>AES has been trying for years to make the best use of their investment by attempting to rezone and build condominiums, not to operate as a power plant. The voters have rejected their ballot initiative to rezone.</p> <p>So we were very excited to learn that the new owners were planning to create parkland with the property.</p> <p>Now we learn that the new owners are seeking an unnecessary extension.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>
343.03	<p>You have stated in your own report from March of 2019 that, "At this time, SACCWIS does not recommend a change in compliance date for the Redondo Beach facility."</p> <p>Please honor your recommendation and commitment to the people of California by not permitting another extension. This is nothing more than a stall tactic.</p>	<p>As stated in Section 5.1 of the Staff Report, "The SACCWIS met on March 8, 2019, concluding in its annual 2019 Final SACCWIS Report that no OTC Policy compliance date extensions were recommended at that time." However, in the same Section of the Staff Report following this sentence it reads, "However, the SACCWIS identified potential local grid reliability issues in the Western Los Angeles Basin related to delays in the Mesa Loop-In transmission project and determined that further analysis was needed to determine if local grid reliability would be impacted." Section 5.1 of the Staff Report goes</p>

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		<p>on to state: “On January 23, 2020, the SACCWIS convened and approved the Recommended Compliance Date Extensions for Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach Generating Stations report [January 23, 2020 SACCWIS Report],... presenting alternatives and a preferred recommendation to the State Water Board to consider extending the aforementioned four power plants by up to three years to address system-wide grid reliability issues.”</p> <p>Please also see Master Responses 2.1 and 2.2.</p>
343.04	Hermosa Beach and Redondo Beach have voted to oppose any extension. Please honor the wishes of these cities.	Please see Master Responses 2.1 and 2.2.
344.01	I am writing to encourage you not to extend operation of the AES Redondo Beach power plant.	Please see Master Responses 2.1 and 2.2.
344.02	It is unfortunately placed in what has become a dense residential neighborhood.	Comment noted. Please also see Master Responses 2.1.
345.01	Please do not extend the AES power plants.	Please see Master Responses 2.1 and 2.2.
345.02	the plant and it is an absolute eye sore to our beautiful coast.	Comment noted. Please see Master Responses 2.1.

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345.03	More importantly, is discharges pollutants and particles that is unhealthy to breathe.	Please see Master Response 2.5.
345.04	It is an old and antiquated plant that is dangerous to the community around it and contributes very little to the power grid.	Comment noted. Please see Master Response 2.2.
346.01	I am writing in extreme opposition to extending the agreement for the AES powerplant in Redondo Beach to continue operation past 2020. The plant is scheduled to cease operations 12/31/2020, and I ask that you ensure that operations cease then as planned. AES has known for a decade that the life of the powerplant does not extend past 2020, and so did the prospective buyer.	Please see Master Responses 2.1 and 2.2.
346.02	I know I am joined by many neighbors, as well as the City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District which all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
346.03	My family's major concerns are the air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,000 people living within 1 mile of the AES power	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3 and 2.5.

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	<p>plant. I hope you are aware that a health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
346.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1, 2.2, and 2.4.
346.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an</p>	Please see Master Responses 2.1 and 2.4.

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	extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	
346.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
346.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
347.01	I oppose any extension of the AES Redondo Beach power plant.	Please see Master Response 2.1.
347.02	It's time to clean up our beaches, stop polluting our ocean and air, and honor a years-old commitment to close the plant. The city and its people have waited long enough.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3 and 2.5.
348.01	The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	<p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
348.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition o continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Comment noted. Please also see Master Responses 2.1, 2.3, and 2.5.
348.03	A previous health impact study conducted by the City of Hermosa Beach found- even at 5%production- the AES power plant was the largest source of fine particulate pollution in the area and second only to	Please see Master Response 2.5.

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	<p>vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
348.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
348.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	<p>Please see Master Responses 2.1 and 2.4.</p>

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348.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
348.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
348.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Comment noted. Please see Master Response 2.2.
349.01	Retire the plant now.	Comment noted. Please see Master Responses 2.1 and 2.2.
350.01	we have witnessed a number of troubling goings-on at the plant - loud alarm sirens followed by deafening steam releases, routinely smelly discharges, the loud continuous rumbling of seemingly normal operations that wakes up our baby and scares our dog at night.	Comment noted. Please see Master Response 2.1.
350.02	I understand the need to guarantee California's energy generation capacity, but I find it hard to believe that this particular plant is essential,	Please see Master Response 2.2.

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	especially given the decreased energy consumption that's been associated with the safer-at-home order.	
350.03	I urge you to please have our state's governing agencies live up to their word and uphold the original retirement mandate. The energy buffer is simply not worth the cost to the community and the environment.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
351.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
351.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from many</p>	Comment noted. Please also see Master Responses 2.1, 2.3, and 2.5.

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	<p>Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
351.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
351.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Comment noted. Please also see Master Responses 2.1 and 2.2.
351.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
351.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
351.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
351.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the	Comment noted. Please see Master Response 2.2.

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	state's power plants are on track to be able to produce at least 21% more electricity than California needs.	
352.01	<p>As a 20-year Hermosa Beach resident, and owner of a vessel moored in Redondo Harbor that has been constantly showered with debris coming from the AES power plant over the years that has cost me a small fortune to clean upon a monthly basis, I am VEHEMENTLY opposed to the extension of the AES power plant beyond the December 31st 2020 mandated deadline for permanent closure.</p> <p>The stated mission of the California Water Resources Board is: "To preserve, enhance and restore the quality of California's water resources for the protection of the environment, public health and all beneficial uses for the benefit of present and future generations."</p> <p>To this end, to prove to us - the tax paying general public, and residents of the area directly affected by the decision you make in a remote location very far away from here - that you actually believe in your own mission, I ask that you uphold the mandated retirement deadline of December 31st, 2020 for AES Redondo Beach.</p>	Comment noted. Please also see Sections 5.1, 5.5, and 5.6 of the Staff Report and Master Responses 2.1, 2.2 and 2.5.

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352.0	The AES plant in Redondo Beach has ruined the environment, the air, the ocean, and killed myriad sea life that have been sucked into it's cooling inlet, or negatively effected by the residual water that re-enters the ocean. So much so, that AES were forced to open a 'rescue 'center for those animals that survived, and labelled it a 'Sea Lab Marine Education Center' in a furtive effort to make us believe they were doing good.	Comment noted. Please also see Master Responses 2.3 and 2.4.
352.0	And here's a warning: If anyone on the board or affiliated with the Water Board, is receiving any benefit from AES or any associated party so as to 'motivate' the Waterboards decision for an extension beyond the mandate, you WILL be exposed.	Comment noted. Please also see Master Response 2.2. Additionally, please see response to comment 276.01.
353.01	I ask as a resident who lives two blocks from the Redondo Beach AES power plant, to shut the plant down as per an agreement that was reached earlier by the California State Water Resources Board. It is a major polluter and it's operations kill ocean wild life.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.3. The State Water Board has not been party to any agreements regarding retirement of the Redondo Beach facility.
354.01	Please uphold the original decision of shutting down the Redondo Beach Power Plant in December of 2020. Our communities livelihood is more important that a missley few years of profiting over human quality of life.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.

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355.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Please see Master Responses 2.1 and 2.2.
355.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still running.	Please see Master Responses 2.2 and 2.5.
355.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please also see Master Response 2.1.
355.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1 and 2.4.
355.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Section 5.1 of the Staff Report and Master Responses 2.1 and 2.2.

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355.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted. Please also see Master Responses 2.1 and 2.2.
356.01	I strongly oppose any extension for the AES power plant – new owner or not. I don't understand why keeping the plant open is even considered. Isn't it enough that the plant's closure had already been decided and planned for, with good reason?	Comment noted. Please also see master responses 2.1 and 2.2
356.02	Why is the new owner a reason to keep the plant running? Will the new owner stop all the noise and pollution from the plant? Will the new owner prevent citizens from getting cancer or having other health impacts? I just don't get it. The plant needs to be closed down as scheduled by 12/31/2020.	Comment noted. Please also see master responses 2.1, 2.2 and 2.5.
357.01	As a long time resident of Redondo Beach, I ask that you not extend AES Redondo Beach operation, but let it retire on 12/31/2020 as currently scheduled. We would like to see the property demolished, along with its pollutants that poison our waters, and air.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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358.01	Extending the life of the Redondo Beach AES Power plant for an additional 3 years is not supported by me and most residents in Redondo Beach.	Comment noted. Please also see Master Responses 2.1 and 2.2.
358.02	It is not a good idea environmentally and its time has come to be closed down as the cooling technology is obsolete.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
358.03	This has been an issue for so long in the community ultimately causing Redondo's waterfront to deteriorate because of inaction in knowing the future.	Comment noted.
358.04	Redevelopment plans that include open space, pier upgrades and environmental safety have been stymied and challenged in courts for years by the city and the desires of the local community costing tax payers millions of dollars. To proceed with your recommendation of a 3 year or even 1 year will once again cause delays and discord. It already has because the plant has been sold AGAIN to a developer who has in his proposal, sale terms that do not favor the open space wanted if the board goes to a 3 more year operation.	Comment noted. Please also see Section 5.1 of the Staff Report and Master Responses 2.1 and 2.2.
359.01	I am extremely opposed to the proposed extension of the retirement of the AES plant in Redondo Beach.	Comment noted. Please also see Master Responses 2.1 and 2.2.

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359.02	<p>It has had negative environmental effects to this area for too long, and we have fought vigorously for many years to be able to change that.</p> <p>You must do what's right for health and safety of the residents and go forward with retiring the plant at the end of 2020.</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
360.01	Please hear our voice and close down that plant asap and clean up that beautiful Redondo Beach. Please Especially for Mayor Brand who has stage four Lung Cancer, please get it done!	Comment noted. Please also see Master Responses 2.1 and 2.5.
361.01	I am strongly urging you to keep the Dec. 2020 closing date for the AES power plant in Redondo Beach. At that time they would have had ten full years to get their act together. That is ample time for them to plan the closing. I am not interested and do not care about their profit margin, I care about the South Bay community.	Comment noted. Please also see Master Responses 2.1 and 2.2.
361.02	We have plenty of alternative power sources and WANT AES TO GO.	Please see Master Responses 2.1 and 2.2.
362.01	The AES plant is scheduled to cease operations at the end of 2020. I urge you to make sure they cease then.	Please see Master Responses 2.1 and 2.2.
362.02	I'm concerned about air pollution and carbon emissions from the aging units which would adversely	Please see Master Responses 2.1, 2.2, and 2.5.

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Letter and Comment Number	Comment	Response
	<p>affect residents in Hermosa and Redondo Beach, as well as the surrounding area. Think of the 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border, across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	
362.03	<p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. A previous health impact study conducted by the City of Hermosa Beach found- even at 5%production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p>	<p>Commented noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
362.04	<p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p>	<p>Please see Master Response 2.5</p>

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Letter and Comment Number	Comment	Response
362.05	We don't need AES Redondo for grid reliability. As the LA Times reported, California has a big, and growing, glut of power.	Please see Master Response 2.2.
362.06	The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs."	Please see Master Response 2.2.
363.01	Please vote against extending the operation of the water plant. It is vital for our city to be rid of this monstrous polluting thing.	Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
364.01	It is far too old to continue to operate. Let's be realistic ~ it's old and dirty and shouldn't run any more, especially in a dense area as we live in here. Let's decommission it once and for all.	Please see Master Responses 2.1 and 2.2.
365.01	Please – NO EXTENSION for the operations of the AES Power Plant in Redondo Beach. Please – Close the plant on December 31, 2020 as you planned. The State Water Resources Control Board did the right thing when they chose to listen to the environmental experts and order the plant closed no later than December 31, 2020.	Please see Master Responses 2.1 and 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
365.02	I've lived my entire 63 years in Southern California and this closure would go a long way to helping the marine life and the ocean we love.	Comment noted. Please also see Master Response 2.3.
366.01	<p>PLEASE ensure the operations within the AES Power Plant are shut down no later than December 31,2020.</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Please see Master Responses 2.1 and 2.2.
366.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from many Hermosa Beach homes. Any extension of its</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
366.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Commented noted. Please also see Master Responses 2.1, 2.2, and 2.5.
366.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and	Commented noted. Please also see Master Responses 2.1, 2.2, and 2.4.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
366.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
366.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
366.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
366.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Comment noted. Please see Master Response 2.2.

Table 6 – Comment Letters 300 to 399
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
367.01	Hello, I wanted to send my support to retire the Redondo Beach AES plant. I would appreciate your efforts in not extending a plant which is loud, bad for the environment, dangerous to the residents who live in such close proximity, poorly managed, an eye sore, and of very little value to the taxpayers.	Comment noted. Please also see Sections 5.3, 5.5, and 5.6 of the Staff Report and Master Responses 2.1, 2.2, 2.3, and 2.5.
368.01	I live in Hermosa Beach and am concerned about local air pollution and carbon emissions from the aging units that adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.	Comment noted. Please also see Sections 5.5 and 5.6 of the Staff Report and Master Responses 2.1, 2.2, and 2.5. Sections 5.5 and 5.6 of the Staff Report were revised to include environmental justice concerns as well.
368.02	A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate	Commented noted. Please also see Master Responses 2.5.

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Letter and Comment Number	Comment	Response
	emissions kills more than double the number of people who die from breast cancer in California.	
368.03	The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
368.04	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
368.05	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
368.06	I, as a resident of Hermosa Beach, join the Hermosa Beach City Council voicing opposition to the continued operation of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. I ask that you ensure that operations cease on its scheduled date of 12/31/2020 to cease operation.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
369.01	CALL TO ACTION: Please close the Redondo Beach AES power plant! I voted to shut it down 10 years ago!	Comment noted. Please also see Master Responses 2.1 and 2.2.
369.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
369.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	Commented noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
369.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	<p>Commented noted. Please also see Master Responses 2.5.</p>
369.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public</p>	<p>Commented noted. Please also see Master Responses 2.1, 2.2, and 2.4.</p>

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Letter and Comment Number	Comment	Response
	uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
369.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
369.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
369.08	They are already, unexpectedly extending the retirement date of three other large powerplants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
369.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Comment noted. Please see Master Response 2.2.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
370.01	Please do not extend the life of the old power plant in Redondo Beach.	Please see Master Responses 2.1 and 2.2.
370.02	It is a blight on our beautiful city. When it runs, which is not often, it makes a noise in the middle of the night that sounds like someone is landing a hot air balloon on our roof. And we are perhaps a mile away. It belches black smoke.	Comment noted. Please also see Staff Report and Master Responses 2.1 and 2.5.
370.03	Our city is divided about what should go in its place, parkland or businesses. But no-one - not anyone - wants a power plant there.	Comment noted. Please also see Master Response 2.1.
370.04	Our schools all run on solar power - and I am sure we are all willing to install solar elsewhere if we can just be rid of the plant.	Comment noted. Please also see Master Response 2.2.
371.01	Over the years in addition to black and gray smoke coming from the plant, I've been awakened in the middle of the night to loud noise from the plant, most recently just a few nights ago. In fact the first time I heard it it was scary and frightening as I didn't know what was causing it.	Comment noted. Please also see Master Responses 2.1 and 2.5.
371.02	I along with a lot of other residents of Redondo Beach and Hermosa Beach are very concerned about not only about the global environment but our local environment and what the future holds for the health and viability of our children and grandchildren.	Comment noted. Please also see Master Responses 2.3 and 2.5.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
371.03	We have waited patiently for years for the retirement of this plant which is located in a densely populated area and pollutes not only the air but the ocean. It needs to be closed down as planned by the end of this year.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
372.01	The AES plant is a noisy eyesore that pollutes our ocean and our air, and has blighted our waterfront for decades. It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise.	Comment noted. Please also see Master Responses 2.3 and 2.5.
372.02	When the plant was recently purchased, we were all for the decommissioning of the power plant in December 2020. It is bad for our health and unnecessary!! Our health is at risk and we look forward to the power plant being de-commissioned.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
373.01	Please do not allow AES to extend the use of the power plant in Redondo Beach. The plant is rarely used and has been proven to be unnecessary to the power grid. They need to proceed with dismantling the plant so the land can be put to better use for the community and the environment.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
374.01	The plant should be shut down on schedule, rather than extended for a period of up to 3 more years.	Please see Master Responses 2.1 and 2.2.
374.02	We are tired of the plant's loud noises, its thick black smoke, and most importantly, the air contaminants emissions that cause lung illness.	Comment noted. Please also see Section 5.6 of the Staff Report and Master Responses 2.1 and 2.5.
374.03	I live blocks from the plant and are often disturbed by the LOUD noises and scary sounds that seem like fireworks or gunshots.	Commented noted. Please also see Master Response 2.1.
375.01	Please consider this brief email to ask to close the operation of the RB Power Plant.	Commented noted. Please also see Master Responses 2.1 and 2.2.
375.02	The gas-fired power plant, which uses a controversial cooling method, is set to close at the end of the year. Three other gas-fired power plants in Southern California use the same method, known as once-through cooling, during which seawater runs through the plant one time before going back to the ocean. Environmentalists have opposed this process, saying it harms marine life.	Please see Master Responses 2.1 and 2.2, and 2.3.
375.03	State regulations now prohibit the OTC method. The Huntington Beach plant and the Alamitos one, in Long Beach, will replace their systems with air-cooled ones; the plants in Redondo Beach and Ormond Beach, in Oxnard, are scheduled to close.	Commented noted. Please also see Section 5.1 of the Staff Report and Master Responses 2.1 and 2.2. Section 5.1 and 5.5 of the Staff Report were revised to include the CPUC's updated recommendation for Ormond Beach from a one-year extension to a three-year extension in D.20-

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Letter and Comment Number	Comment	Response
		0-028, which is consistent with SACCWIS' Alternative 4.
376.01	We are Redondo Beach residents for 35 years and have been looking forward to the day when this Outdated Monstrosity will be retired for good.	Commented noted. Please also see Master Responses 2.1 and 2.2.
376.02	Within a stone throw from RB High School.	Commented noted.
376.03	Polluting our Air and killing Ocean Live.	Please see Master Responses 2.3 and 2.5.
376.04	Not really needed for local/regional power supply.	Please see Master Response 2.2.
377.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Please also see Master Responses 2.1 and 2.2.
377.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most poluting per kilowatt of any coastal plant still running.	Please see Master Response 2.2, 2.3, and 2.5.
377.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and our side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please also see Master Response 2.1.
377.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request,	Please see Master Responses 2.1 and 2.4.

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Letter and Comment Number	Comment	Response
	both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	
377.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Responses 2.1 and 2.2.
377.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Please see Master Responses 2.1 and 2.2.
378.01	I am writing to urge you to NOT extend operation of the Redondo Beach AES Power Plant. This plant is a noisy and polluting eyesore that has long been scheduled to close on December31, 2020. There has been a 20 year lead time for the plant's operators to plan for closure, making the request for an extension ludicrous.	Comment noted. Please see Master Responses 2.1 2.2, 2.3 and 2.5.

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Letter and Comment Number	Comment	Response
378.02	Redondo Beach has opportunities and plans to redevelop the waterfront in ways that will enhance the quality of life for all residents and improve access to the coastline for everyone. The sooner the process of redevelopment can get started, the better.	Comment noted. Please see Section 5.5 of the Staff Report and Master Responses 2.1 and 2.2.
378.03	We do not need to continue to have a massive, antiquated structure looming over our waterfront, to have the plants warm water effluent destroying our marine environment, or to continue to breathe the noxious fumes emitted by the plant.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
379.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Please see Master Responses 2.1 and 2.2.
379.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still running.	Please see Master Response 2.2, 2.3, and 2.5.
379.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please also see Master Response 2.1.
379.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the	Please see Master Responses 2.1 and 2.4.

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Letter and Comment Number	Comment	Response
	owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	
379.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Responses 2.1 and 2.2.
379.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Please see Master Responses 2.1 and 2.2.
380.01	Hello, I am requesting the life of AES Redondo powerplant to NOT be extended beyond December 2020.	Please see Master Responses 2.1 and 2.2.
380.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still running.	Please see Master Response 2.2, 2.3, and 2.5.

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380.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please also see Master Response 2.1.
380.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1 and 2.4.
380.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Responses 2.1 and 2.2.
380.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	leaders are unanimous in opposing extension of AES Redondo's operating life.	
381.01	The noise is a problem, but the worst problem is the soot that settles on our cars and patios and other outdoor areas. It gets everything filthy: patio umbrellas, furniture, etc. When we are in a drought and ordered to not use water to wash down our patios, it is a mess without a solution.	Comment noted. Please also see Master Responses 2.1 and 2.5.
381.02	It is high time to get rid of this dinosaur of a nuisance. Please keep the Dec. 31,2020 deadline for shutting it down.	Please see Master Responses 2.1 and 2.2.
382.01	I am a resident and home owner of South Redondo Beach, right above the AES power plant. I am writing to express that I strongly oppose the AES request to extend the current December 31, 2020 deadline for power plant to close. Please do not extend. Please shutdown the power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
382.02	Please do not change the zoning for parkland.	Please see Master Responses 2.1. The State Water Board authority does not extend to zoning laws.
383.01	As a taxpayer and resident of Redondo Beach, my family and I would like you to adhere to the original agreement and cease operations of AES Redondo by 1/1/2021.	Comment noted. Please also see Master Responses 2.1 and 2.2. Additionally, the compliance date for Redondo Beach is December 31, 2020, and is proposed to be

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Letter and Comment Number	Comment	Response
		extended to December 31, 2021 to address grid reliability.
383.02	This plant is not needed to meet the excess capacity that CAISO and the CPUC have determined is necessary. This action would cause further environmental damage to the thousands of Redondo and Hermosa residents living in its shadow as well as marine life in and outside the Harbor.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
384.01	I oppose the extension of the operation of AES Redondo Beach Power Plant. This outdated facility is a large polluter and any need for a “back-up power source” should be redirected to more efficient and more centrally located facilities. As a resident for 36 years, (I was born and raised in Hermosa Beach, and have since lived in Redondo Beach for the past ten years), I look forward to your decision to NOT extend the AES RB Power Plant operations as a reflection of your Mission to enhance public health and the preserve/restore the environment and water resources.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
385.01	I respectfully request that you not extend the deadline for AES to close the Redondo power plant by December 31, 2020. I also request that you require AES and the new owner of the property to quickly and	Comment noted. Please also see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	safely remove the power plant and power lines as early as possible in 2021.	
385.02	I was born in Redondo Beach and I live about a mile away from the power plant. Sadly I see the smoke from power plant and loud noises coming from it at various hours of the day and late night. It has blighted our waterfront for decades and it's time for it to be closed and removed.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
386.01	As a Redondo Beach resident I am writing to support the efforts of many local groups including: The cities of Hermosa and Redondo Beach The school boards of Hermosa and Redondo Beach The Beach Cities Health District Heal the Bay Surfrider Foundation We ask that you ensure operations Of the AES power plant cease as of 12/31/2020 as schedule. Protect our beautiful community and remove this hazard from our area.	Comment noted. Please also see Master Responses 2.1 and 2.2.
387.01	I'm a South Bay resident of almost two decades and proud to be a homeowner raising my young family in Redondo Beach. I'm writing you because I hope messages like these help get the AES plant retired once and for all.	Comment noted. Please also see Master Responses 2.1 and 2.2.
387.02	We were recently walking in the vicinity of the AES plant and my daughter asked me what that "gigantic ugly building was?" I told her it was a power plant.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.3.

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	<p>And then she asked me, "Isn't it bad for a power plant to be that close to the ocean?" And I told her it was. My 2.5-year-old did like the painting though. If a 6-year-old understands that it's not safe or smart to have a power plant that close to the ocean, you all should, too.</p>	
388.01	<p>I am in opposition to any extension of Redondo Beach's AES power plant. Please consider our community's opposition.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
389.01	<p>I'm a southern Californian native and have lived in the beach cities my whole life. I now reside on 190th (Anita) and PCH with my 2 year old and am expecting another baby in a couple months. I have lived in our current house for the last decade and have spent many years of my childhood in Redondo Beach. My mother grew up close to where my house is as well. Since we can remember, we have wished that we could remove the power plant. It has been on the ballots for years, but doesn't seem to ever officially go through.</p> <p>We love the coastline, the vibe of the city and the health and beauty of the beaches. It would be beyond amazing if we could finally get this power plant removed. It is something that the locals of the city have wanted and pushed for over the last 30 years.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>

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Letter and Comment Number	Comment	Response
	<p>I want to ask everyone at the State Water Board to please include the locals of Redondo Beach in your thoughts as you make the decision on this power plant. It would be an amazing benefit to give our children the space to play and use the land, rather than to let the power plant stay!</p>	
389.02	<p>Please do not grant compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5,6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p> <p>Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.3.</p>
389.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, and 2.4.</p>

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	restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	
389.04	The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.	Comment noted. Please also see Master Responses 2.3 and 2.4.
389.05	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Responses 2.1, 2.2, and 2.4.
389.06	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Comment noted. Please see Master Responses 2.1 and 2.2.
389.07	Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	in our state's economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.	
390.01	We here in Redondo Beach want the power plant to shut down at the scheduled proper time, end of this year. As you're aware, the power plant is scheduled to shut down at the end of this year on December 31, 2020, but The Public Utilities Commission wants to extend the operations of the AES Redondo Plant for up to 3 more years. We feel the plant should be shut down on schedule, rather than extended operations for a period of up to 3 more years.	Comment noted. Please also see Master Responses 2.1 and 2.2.
390.02	I have asthma and I don't want to be exposed to the emissions any longer, not to mention the eyesore it is in the skyline of our beautiful shores. I am tired of the plant's loud noises, its thick black smoke, and most importantly ,the air contaminants emissions that cause lung illness.	Comment noted. Please also see Master Responses 2.1 and 2.5.
391.01	We oppose extension of the operations of the outdated AES power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
391.02	The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	<p>the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations do in fact cease then.</p>	
391.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant.</p> <p>The residents of Redondo Beach and the Redondo Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
391.04	A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to	Comment noted. Please also see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
391.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	<p>Commented noted. Please also see Master Responses 2.1, 2.2, and 2.4.</p>
391.06	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	<p>Please also see Master Responses 2.1 and 2.4.</p>

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Letter and Comment Number	Comment	Response
391.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please also see Master Responses 2.3 and 2.4.
391.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
391.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Comment noted. Please also see Master Response 2.2.
392.01	I am opposed to any extension of operation given to AES Redondo Beach power plant or to the new property owners for continued use as a power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
392.02	I was raised in Redondo Beach. I have watch the pollution generated by this plant for the past 30 years. The plant's continued operation is horrible for human quality of life. Operation of the plant produces CO2 emissions adding to our toxic footprint, and operation of the plant is destructive to wildlife in the ocean.	Comment noted. Please also see Master Responses 2.1, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
393.01	I am writing this email to oppose any extension of operations of the AES power plant. The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease permanently at that time.	Comment noted. Please also see Master Responses 2.1 and 2.2.
393.02	The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
393.03	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
934.01	Please do not extend the deadline for closing down AES by the end of 2020. This is an eye sore, noise and environment polluter. Just the other night we could hear this shuttering sound from the plant. We need to keep to the planned closing.	Comment noted. Please also see Master Responses 2.1 and 2.2.
395.01	I am writing to urge the California State Water Resources Control Board NOT to permit ANY	Comment noted. Please also see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	extension of the life of the AES power plant on Harbor Drive in Redondo Beach.	
395.02	I am a 43-year resident of Hermosa Beach, living 3/4 of a mile from the plant. Apart from having had to put up with the plant's noise and ugliness for decades, I am well aware that my own life and the lives of friends and family have been shortened by the pollution it has emitted and continues to emit into our air and seawater.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
395.03	The plant is no longer needed but continues to do damage. It was built during a time when environmental awareness was limited and the extraordinary potential for harm created by putting various sorts of fossil fuel processing installations anywhere near current or future residential areas was poorly understood.	Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
395.04	Today, EVERY environmental organization and affected municipality in the South Bay wants that plant gone yesterday, because times have changed, understanding of problems has deepened, and the need for the plant's contribution to the grid has nearly vanished and will vanish completely as new energy sources are brought online. Application for extension of the plant's life at this point cannot possibly be based on anything but malevolent greed.	Comment noted. Please also see Sections 5.1 and 5.5 of the Staff Report and Master Responses 2.1 and 2.2.

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396.01	I live in Redondo Beach and want the power plant to close by December 31 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
397.01	Please allow the AES plant to close as scheduled on 31 Dec 2020.The property is the perfect place for the mandatory watershed project to clean the storm water before it enters the ocean.	Comment noted. Please also see Master Responses 2.1 and 2.2.
398.01	I am against the extension of the AES Redondo Power Plant. We should set an example for the rest of the country by rejecting old plants that exorbitantly pollute and damage the ocean ecosystem.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.3.
398.02	The local leadership and the vast majority of citizens of the South Bay oppose the AES Power Plant. The only reason to keep it is profits. Profits for pollution. Please respect the environment, air quality, the fragile sea life and the will of the people!	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.4.
399.01	Please keep the December 31, 2020 deadline to shut down the AES power plant. It is detrimental to the health and environment of Redondo Beach.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.4.

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Letter and Comment Number	Comment	Response
400.01	<p>We really need to get started on the wetlands restoration project on the AES property. The electrical needs currently are way down because of COVID- 19 and this slowdown may well last for years.</p> <p>They have had 70 years of producing power at that plant and it using 70's tech and is efficient compared to new plants today. Please stay the course with the already arranged shutdown and ignore the extension.</p>	Please see Master Responses 2.1 and 2.4.
401.01	<p>The AES power plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then. Please make sure that this occurs.</p> <p>I lived extremely close to this plant and have been waiting for 17 years for the plant to be removed.</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p>	Comment noted. Please see Master Response 2.1.
401.02	There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.	
401.03	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.4 and 2.5.
401.04	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Comment noted. Please see Master Responses 2.3 and 2.4.
401.05	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
402.01	My comment is to CLOSE the AES plant. Please follow through with the process that was promised and approved.	Comment noted. Please see Master Response 2.1.
403.01	Please make sure the AES Power plant in Redondo Beach is shutdown in December 2020 - do not extend the time it may operate. It is a polluter & an eyesore, in a very densely populated area.	Comment noted. Please see Master Responses 2.1, 2.3 and 2.5.

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	<p>The citizens of Redondo have made it explicitly known that they do not want this power plant in the city anymore. I personally, have voted against it & have shown up at several city council meetings to promote its removal.</p> <p>Please do the right thing & honor the community by not letting this power plant operate beyond December.</p>	
404.01	<p>The Redondo Beach power is not needed. Our plant is tightly surrounded by high density residential uses on all sides... no other plant is. In fact, the population in a one mile radius of our power plant exceeds that population of the other three alternative plants COMBINED. There are six schools, multiple health care and senior facilities, parks, bike paths and gyms surrounding our plant, again, unlike any other. Add to that our unique topography - in the direction of the prevailing winds the land slopes steeply upward to the same height as the smokestacks, further exacerbating exposure to toxic emissions.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5.</p>
404.02	<p>There is also an active wetland on the site. AES has a cease and desist order from the Coastal Commission to prevent AES from dewatering the wetland. AES submitted a letter to the Commission stating it cannot run safely if it cannot</p>	<p>Please see Master Response 2.4.</p>

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	dewater. So by AES' own admission it can't safely run and protect the wetlands.	
404.03	Please do not extend the operation of the Redondo Beach power plant at the peril of local residents and wildlife.	Comment noted. Please see Master Response 2.1.
405.01	I'm writing to let you know that I'm IN FAVOR of closing the Redondo Beach power plant at the end of 2020 as scheduled. I have been a resident of Redondo Beach for over 20 years, and have witnessed the continued pollution the plant emits. Please give the citizens of Redondo Beach cleaner air by making sure the plant closes!!	Comment noted. Please see Master Responses 2.1 and 2.5.
406.01	<p>I oppose the extension of the operations for the AES power plant for the following reasons:</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p>	Comment noted. Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
406.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
406.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p>	Please see Master Response 2.5.

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	<p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
406.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
406.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.4 and 2.5.
406.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality,</p>	Please see Master Responses 2.3 and 2.4.

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	help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	
406.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
406.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
407.01	I urge you to protect the ocean by retiring the four gas-fired power plants that are scheduled to be closed December 31, 2020. This decision was made 10 years ago because it was known that they would no longer be needed. The people who made this decision were right. They are not needed. SoCal Edison has acquired 770 megawatts of new battery storage coming online by August 1, 2021, there is no need for these plants for grid reliability.	Please see Master Response 2.2.
407.02	If an extension is necessary, in the interim until the battery storage is online, the extension should not apply to the Redondo Beach facility, which is too	Please see Master Response 2.2.

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	<p>antiquated to be useful for emergency use and the remaining three power plants should not be allowed to continue seawater cooling beyond August 1, 2021.</p> <p>We need a just transition away from fossil fuels and that should begin by replacing polluting power plants with power from renewable sources.</p>	
408.01	<p>I write to express my opposition to any extension of the AES Redondo Beach Generating Station’s compliance deadline under the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (OTC Policy). The RBGS is unnecessary to ensure the reliability of the State’s electric supply, emits a significant amount of pollutants in a dense urban area, and significantly impairs water quality and the beneficial uses of King Harbor. For these reasons, and others to be provided in the following bullet points, I respectfully requests that the State Water Resources Control Board modify the Staff Alternative Five to omit the one year extension for the RBGS under the proposed amendment to the OTC Policy.</p>	<p>Comment noted. Please see Master Responses 2.2, 2.3, and 2.5.</p>
408.02	<p>AES Redondo s a gas-fired, 1950s-technology powr generation station, the least efficient and</p>	<p>Please see Master Response 2.2.</p>

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	most polluting per kilowatt of any coastal plant still running.	
408.03	AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please see Master Response 2.1.
408.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase half of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Responses 2.1 and 2.4.
408.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2. Additionally, Sections 5.1 and 5.5 of the Staff Report were revised to include the CPUC's updated recommendation for a three-year extension.
408.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	
409.01	<p>I am a 30-year resident of Redondo Beach writing to support the retirement of the AES Power Plant on Harbor Drive in Redondo Beach on or before December 31, 2020. The AES Plant has been an eyesore and environmental problem at the Redondo Beach waterfront for decades. In recent years, it has become clear that the Plant is obsolete and produces little if any power for the city or the Region. Our waterfront should no longer be blighted with the industrial use of a power plant, especially now that the useful life of the AES Plant is over. It is time for the City of Redondo Beach and the new owner of the power plant site to move forward with more attractive and environmentally friendly uses for the 50-acre site. Please do not extend the operation of the AES Power Plant beyond December 31, 2020. Support the wishes of the Redondo Beach community and finally end the operation of the toxic AES Power Plant so it can be replaced with waterfront uses for the property that</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	are more appropriate for a Southern California beach community in the 21st Century.	
410.01	I was born in Hermosa Beach and have lived in the South Bay 44 years. I served the County of Los Angeles for over 20 years as an Ocean Lifeguard in our local community, and I do not support extending the life of AES Redondo power plant beyond December 2020. As a resident of Palos Verdes Estates and father of 3 kids, I do not want to be downwind of this polluting plant. Please do the right thing and close the plant on or before December 2020.	Comment noted. Please see Master Response 2.1.
411.01	Keep the December 31, 2020 deadline to shut down the AES power plant. No one in Redondo Beach wants that plant. It produces pollution and kills wildlife. Shut it down.	Comment noted. Please see Master Response 2.1.
412.01	For the safety of our family and community, as well as our oceans, my family vehemently opposes the proposed extension for the AES power plant in Redondo Beach. We are in support of the planned retirement December 31, 2020.	Comment noted. Please see Master Response 2.1.
413.01	Please do not extend the life of the AES power plant for these reasons---	Comment noted.
413.02	AES Redondo s a gas-fired, 1950s-technology power generation station, the least efficient and	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
	most polluting per kilowatt of any coastal plant still running.	
413.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four sides of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all three of the other power plants combined.	Comment noted. Please see Master Response 2.1.
413.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase half of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Response 2.4.
413.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating life not be extended.	Please see Master Response 2.2.
413.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	
414.01	<p>We oppose any and all extensions of the Redondo and hermosa power plant.. its ridiculous the dirt, soot, unhealthy particles they release daily.. get it out of here now.. see the photos attached from 7pm may 8th.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5.</p>
415.01	<p>I am writing to say I strongly oppose the power plant staying open. Everyone has know for 10 years that this date is coming. There is no reason to accommodate the new owners request for more time. I do not see how the owner purchased this property and then needs the plant open for financial reasons.</p> <p>It's time to take this plant down and open up our coastal land.</p>	<p>Comment noted. Please see Master Response 2.1.</p>
416.01	<p>I oppose granting an extension to the AES power plant. It is not in the best interests of our community. The power plant is scheduled to end it's operations at the end of 2020. Please make sure that it happens. Do not allow an extension to</p>	<p>Comment noted. Please see Master Response 2.1.</p>

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Letter and Comment Number	Comment	Response
	this timeline. We don't need AES, in fact, our community will be better off without it.	
416.02	The AES power plant is a noisy eyesore that pollutes our ocean and our air. It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods. Without the AES power plant, the air quality in Hermosa Beach and the surrounding area will improve significantly. The residents of Hermosa Beach and Redondo Beach have made it clear that we disapprove of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.	Please see Master Responses 2.1, 2.3 and 2.5.
416.03	I (and many others) would like to see redevelopment of this area..... open space and a public park would benefit the whole community. We would also like to see a restoration of the coastal wetlands. Wetlands are important and productive ecosystems. An amazing variety of species of microbes, plants, insects, amphibians, reptiles, birds, fish and mammals can be part of a wetland ecosystem. Wetlands provide numerous beneficial services for people and for fish and wildlife, including protecting and improving water quality, providing fish and wildlife habitats. The restoration of the coastal wetlands will improve ocean water quality, help protect marine life, and	Please see Master Response 2.4.

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	provide needed habitat for native flora and fauna and for migrating birds.	
417.01	Please please please do not extend the removal of the Redondo Beach power plant. We moved in nearby a few years ago and have 4 kids and don't want this horrible beast to hurt them!!!! It's not healthy for anyone or our ocean!!!! Please don't extend the date of its removal!	Comment noted. Please see Master Responses 2.1 and 2.3.
418.01	Please close this plant, as agreed upon by the end of this year. There is a variety of positive developments that would benefit our city. We need and will appreciate it now more than ever!	Comment noted. Please see Master Response 2.1.
419.01	I've lived in Redondo Beach for 22 years, and have been waiting for the day when that eyesore is removed so we can rejuvenate the land near our beach, both for people and for wildlife. It's much overdue, and in line with the state's goal in achieving renewable energy sources for our power. Let's make the SouthBay a leader in realizing the future rather than letting the past cling to our community.	Comment noted. Please see Master Response 2.1.
420.01	As a long time resident of Hermosa Beach I am opposed to any extension of the AES Redondo Beach Power Plant. The sooner this facility is closed and dismantled the better for us all.	Comment noted. Please see Master Response 2.1.

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421.01	The life of AES Redondo Power Plant should not be extended beyond December 20, 2020. AES Redondo is a gas-fired, 1950's technology power generation station the least effective and most polluting per kilowatt of any coastal plant still running.	Comment noted. Please see Master Response 2.2.
422.01	Please do not extend the operational use of the AES power plant in Redondo Beach as a power plant past the previously agreed-upon December 30, 2020 end of use deadline. I am a resident in Redondo Beach living within 1/4 mile of the power plant. I have two small children and asthma. Particulates from this power plant blow right up the hill to my children's elementary school which we have to walk to because there are no buses in this area. Particulates fall down upon our small property where, because no one has air-conditioning, we have our windows open most of the year. We are exposed to the pollutants as we play outside as a family, walk to the grocery store/dry cleaner/ post office/drugstore/UPS store down the street, walk to school, play in the nearby parks and beach. Yes when we bought our property several years ago we knew the power plant was here but that it operated very infrequently and only on the hottest days of the summer and was on its way to retirement. There are many many reasons the operational date	Comment noted. Please see Master Responses 2.5.

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	<p>should not be extended; the only reason to keep it is corporate greed. It has been proven through many state and private agencies that the little power this plant produces is not needed.</p>	
422.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Please see Master Response 2.1.
422.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its</p>	Please see Master Responses 2.1, 2.3 and 2.5.

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	<p>operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
422.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.

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422.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Please see Master Responses 2.1 and 2.4.
422.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.4 and 2.5.
422.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
422.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
422.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found	Please see Master Response 2.2.

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	that the state’s power plants are on track to be able to produce at least 21% more electricity than California needs.	
423.01	As a 20-year resident of Hermosa Beach, I am writing to express my opposition of the extension of the AES Plant at the border of Hermosa and Redondo Beach. The communities have spoken and worked for many years now to transition this power plant site to a more beneficial use for both of these communities. The time is now to make that work a reality.	Comment noted. Please see Master Response 2.1
423.02	<p>Redevelopment into a public use open space will have benefits to the community that far exceed the financial benefits the new owner gains by extending the plant’s operation.</p> <p>Let’s be part of the solution to build more community-oriented land usage in our urban home by the beach. This is a legacy that will be meaningful for decades to come.</p>	Please see Master Response 2.1.
424.01	I oppose any extension in the operation of the AES plant in Redondo Beach. The plant is not needed for electricity. When it does run it is frequently loud and alarming. It’s time to move on and tear it down so we can start redeveloping the land.	Comment noted. Please see Master Responses 2.1. and 2.2.

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425.01	<p>I strongly oppose the extension of the operation of the AES Redondo Beach power plant. The power plant is a noisy eyesore that pollutes our ocean and our air, and has blighted our waterfront for decades. It kills everything that enters the 14-foot diameter intake structures that draw in seawater to cool their operations. It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise that scares and awakens everyone nearby at all hours of the night. The fumes that are emitted are harmful to me and my family.</p> <p>I urge the Board to vote to oppose any extensions.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
426.01	<p>I am writing to implore the Board to NOT approve any extension of the operation of the AES-Redondo Beach power plant. This antiquated, gas-fired power plant has had no viable, useful purpose for quite some time. Their lone contract with J.P. Morgan to produce power expired in December 2018. They rarely operate, produce less than 1/10 of 1% of electricity to the California grid (source: CALISO, PUC), and do not provide any power</p>	Comment noted. Please see Master Response 2.2.

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	supply to the city in which they reside and the community they only pollute.	
426.02	There has been much public testimony (notably the mayors of Redondo Beach and Hermosa Beach) in recent weeks apprising the Board of technical issues that must be highly considered in your decision-making process regarding the AES power plant in Redondo Beach. First and foremost is AES-Redondo doesn't have a permit from the California Energy Commission to operate a power plant, old or new, in Redondo Beach beyond December 31, 2020. They applied for and were NOT granted a permit for a new power plant at this location.	AES does not need a new permit from the CEC in order to operate the Redondo Beach facility if the OTC Policy compliance date is extended. In 2015, AES applied for and was denied a permit to construct a new power generating facility on the Redondo Beach property. This does not relate to the currently operating OTC facility.
426.03	Second, the California Coastal Commission has identified 5.6 acres of wetlands on this particular power plant site that are not to be further disturbed. AES themselves has admitted they cannot safely operate their Redondo Beach power plant without disturbing these wetlands, creating a conflict with the California Coastal Commission's identification and expectation. This is a historic opportunity to restore coastal wetlands, turning a highly polluting area into an extremely effective carbon sink since wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.4 and 2.5.

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426.04	As you have no doubt uncovered in your research, we have excess power in this portion of the western region electricity grid. AES-Redondo has never been designated or positioned to be a "run-must-run" power plant for emergency purposes. Of the few remaining "boilers" that still operate from this aging, gas-fired power plant, it takes between 24 and 36 hours for each to "fire up" and actually produce electricity if the boilers are working properly; not exactly a viable facility for an emergency or backup source of electricity.	Please see Master Response 2.2.
426.05	But what it DOES produce during this process is a vast amount of toxins that spew into both Redondo Beach and Hermosa Beach, the most densely-populated coastal community in the entire State of California with 11,000 and 14,000 residents per square mile, respectively in each city, approximately 21,000 of whom live within 1 mile of this power plant. 21,000 residents within one mile of a toxic power plant!!! We get ZERO benefit from this power plant but ALL of the negative impacts that are extremely hazardous to our health.	Please see Master Responses 2.1 and 2.5.
426.06	Both AES and the new owners of the property have recently generated a propaganda sheet with false information to sway your decision as well as dupe the citizens of Redondo Beach.	Comment noted.

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426.07	The property is currently zoned for open space/parkland. AES operates a power plant under a conditional use permit. Once the power plant is retired, the zoning for the site cannot be changed without a vote of the people per Article XXVII of our City Charter. The voters of Redondo have voted AGAINST commercial, mixed-use and residential zoning for this 50-acre site every time it has been on the ballot; twice within the last seven years alone. The new owner is NOT gifting any of their property to the City of Redondo Beach. It's already zoned for parkland and nothing else.	Please see Master Response 2.1.
426.08	Remediation of the property is the responsibility of AES and the new owner, not the City of Redondo Beach or its residents. They are NOT saving the City of Redondo Beach any money as our City does not have to pay a dime for the clean up of this property. If they choose to do nothing and leave the property blighted, the City can take it over using eminent domain. They are not in a position of strength to negotiate any kind of public/private partnership with Redondo Beach ... they need US more than we need them.	Comment noted. Please see Master Response 2.1.
426.09	AES does NOT pay UUT (user utility tax) to the City of Redondo Beach for the use of gas for this gas-fired power plant. As such, there's NO loss of revenue to the City when the power plant is retired.	Comment noted. Please see Master Response 2.1.

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	The City still receives about 17% of the property tax revenue with the rest going to the County of Los Angeles. Any assertion that AES and/or the new owner of the property are somehow a great financial benefit to the City of Redondo Beach is false.	
426.10	It's disturbing to hear the salacious untruths being bandied about to your Board as if extending the life of this power plant is somehow doing something good for Redondo Beach. Nothing could be further from the truth. The only ones who benefit financially are AES and the new owner if this power plant is allowed to operate beyond December 31, 2020. The City of Redondo Beach, it's residents and neighbors lose significantly.	Comment noted. Please see Master Response 2.1.
426.11	Three other power plants are slated for operational extensions in our grid area, adding to our already existing and growing glut of power, ensuring grid reliability. How the Board could add further insult to injury, on top of the Covid-19 pandemic in allowing this kind of toxic, useless, unnecessary, AES-Redondo power plant to continue to pollute the neighborhoods of tens of thousands of residents would be the most egregious, damaging decision you could ever make to inflict more harm to an already suffering community; part of the County	Please see Master Responses 2.2 and 2.5.

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	with the most deaths from coronavirus (to date) in the nation.	
427.01	I am requesting that the life of the AES Redondo power plant to not be extended beyond December 2020. This eyesore billows black smoke all the time and needs to be taken down for the community's health and well-being.	Comment noted. Please see Master Responses 2.1 and 2.5.
428.01	<p>We HAVE HAD enough NOISE and POLLUTION for years and we need to SAVE ourselves and our coastlines from Tons of Particulates per year!!!!!!</p> <p>Everyone knows that this is the right thing to do. Just do it. We will all feel better about ourselves. People over profit is the rule of thumb.</p>	Comment noted. Please see Master Responses 2.1 and 2.5.
429.01	Redondo and Hermosa have been working for many years to ensure the AES Redondo Beach power plant transitions to a more beneficial use. The 60-year-old power plant, across the street from where many of our residents live, has had many negative effects on our environment, health, and quality of life.	Please see Master Responses 2.1, 2.3 and 2.5.
429.02	Currently, AES is required to close by the end of 2020. Meanwhile, a private party recently purchased the property with the aim of redevelopment. Redondo Beach has been working hard with the State and County to direct monies to	Please see Master Response 2.1.

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	this site to assist with redevelopment to maximize open space and public uses such as a park. But now, AES and the new owner are going to benefit financially if the plant operation is extended. There is nothing in the deal for Redondo or Hermosa except more pollution and noise.	
429.03	Hermosa and Redondo Beach have voted unanimously to oppose any extension, but we really need your help. The sooner this plant is gone, the sooner the power lines and all the other impacts are gone.	Comment noted. Please see Master Response 2.1.
430.01	As a condominium owner at The Village, I ask that you allow the AES power plant shut down on schedule, rather than extended for a period of up to 3 more years.	Comment noted. Please see Master Response 2.1.
430.02	It puts out contaminants affecting people's lungs, especially important in this time of the coronavirus which specifically attacks the lungs.	Comment noted. Please see Master Response 2.5.
431.01	I live in Redondo Beach and that I send this email to voice my opinion as a resident of Redondo Beach that the Redondo Beach AES Power Plant should be shut down on schedule rather than being extended for a period of up to 3 more years.	Comment noted. Please see Please see Master Response 2.1.

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431.02	we are tired of the plant’s loud noises, its thick black smoke, and most importantly, the air contaminants emissions that cause lung illness. We as residents of Redondo Beach want it to close no later than December 31, 2020.	Comment noted. Please see Please see Master Response 2.5.
432.01	I’m imploring you to vote against extending operation of the Redondo Beach AES power plant. It needs to be permanently retired as scheduled. As a Redondo Beach citizen, I have put up with this threat to our health and manipulation for greed long enough. I thank you for your time and consideration.	Comment noted. Please see Master Responses 2.1 and 2.5.
433.01	I urge you to vote to oppose the extension of the Redondo Beach AES plant. I live 1/2 mile from the plant in Hermosa Beach on the street that runs directly into the plant - I've been watching the plumes of black smoke from my kitchen window for 30 years.	Comment noted. Please see Master Responses 2.1 and 2.5.
433.02	It makes no sense to keep an outdated and inefficient power generating station running, even as a backup, with 21,000 people living within a mile radius of the plant. It’s dangerous to have this pollution-spewing plant still in operation especially with the added risk of COVID 19.	Please see Master Responses 2.2 and 2.5.

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434.01	<p>I am a Redondo Beach resident and parent who has raised my family in Redondo Beach since 1987.</p> <p>The most obvious reason the AES plant should be shut down are the power utilities own studies have concluded the minimal power it generates is not needed. Add to that if an emergency need should arise the plant is so old and out of date it would take 24 to 36 hours to even start up.</p>	Please see Master Response 2.2.
434.02	<p>Another more serious reason is the toll on public health with hazardous gas and particulates spewed to over 21,000 people that live within a mile of the plant. My sons who attended Redondo Beach schools in their youth both experienced respiratory issues when the plant was operating more frequently.</p> <p>The risk you would be taking by allowing the plant to continue to operate is not worth the harm to our residents and children.</p>	Please see Master Response 2.5.
434.03	Please shut down the plant at the end of 2020 and do not grant any more extensions to continue operations.	Comment noted.
435.01	We are writing about the damage to our air quality affecting Los Angeles beaches with the active AES plant in Redondo Beach. This toxicity has no place	Please see Master Responses 2.3 and 2.5

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	<p>nor need in a high density neighborhood bordering our natural resource of the ocean. Tens of thousands people reside here and even more visit the beach. This is a travesty on any day, now add our current shelter in place when the earth is actually healing. Shame on AES and their supporters. Do not allow them to continue to pump hazardous chemicals into our air, that actual human beings breathe! This air pollution travels through to you too, into the greater Los Angeles area. Keep us healthy and safe. Don't we have enough to deal with now without this problem. DO something please!</p>	
436.01	<p>I am shocked to learn that your board is considering extending the life of the AES power plant in the densely populated city of Redondo Beach. Nearly 10 years ago it was decided that this polluting and unnecessary AES power plant should be closed no later than December 2020 for many reasons, not the least of which were the damage it was doing to our ocean sea life. A decision that bows to the desires of a company to continue to earn a great deal of money running this unnecessary power plant (which runs less than 5% of the time) is unconscionable.</p>	<p>Comment noted. Please see Master Response 2.1.</p>

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436.02	<p>While denial is always comfortable, political courage and action are our best tools for positive change. The hypocrisy of attempting to encourage healthy eating habits and develop young minds while refusing to take a stand against extending the life of this power plant that significantly adversely effects the health and brain development of thousands of our students at a number of our schools in the path of the pollution cloud under the smoke stack of the AES power plant is striking.</p> <p>The AES power plant smoke stacks are visible from the high school, middle school and several elementary schools where most of our children attend. Many studies on children have all found a negative impact of air pollution on cognition (thinking ability). These findings are most dramatically associated with fine matter particulate pollution, which are a primary emission from the AES power plant even with its limited usage. Boston University School of Public Health published a report in 2008 that followed children from birth through 10 years of age. They found that children exposed to greater levels of a certain type of particulate scored significantly worse on tests of memory, as well as both verbal and nonverbal intelligence. More recently, a study published in 2016 by researchers from Columbia University followed children from birth to age 7 and found that</p>	Comment noted. Please see Master Response 2.5.

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	<p>children exposed to higher levels of urban air pollutants known as polycyclic aromatic hydrocarbons while in utero were more likely to experience attention problems and symptoms of anxiety and depression. Similarly a study from the University of Michigan found that children exposed to the highest levels of pollution had the lowest attendance rates and a greater percentage of children who failed to meet state testing standards. A series of studies from researchers at UC Davis have concluded that the emissions of fine matter pollution are directly associated with increase rates of autism spectrum disorders.</p>	
436.03	<p>The decision to continue to allow this polluting and dangerous power plant to operate for even one day longer is a slap in the face to our community. It is well understood that the impact of COVID 19 is made much more deadly by risk factors including asthma and other respiratory issues which are clearly exacerbated by this power plants continued presence so close to so many people.</p>	<p>Comment noted. Please see Master Response 2.5.</p>
436.04	<p>I strongly encourage you to demonstrate the fortitude required to allow the AES power plant to be retired as planned. The electrical power that this plant provides is not required for grid reliability</p>	<p>Please see Master Responses 2.2 and 2.5.</p>

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	and that location is the worst possible location for such an emitter of poison.	
437.01	Thank you for your attention. It is time to act in a responsible manner and to be accountable to the future generations. There is simply no valid argument to justify delaying the closing of the AES power plant in Redondo Beach.	Comment noted. Please see Master Response 2.1.
438.01	Do not extend the Redondo Powerplant, remove it like we voted to!	Comment noted.
439.01	<p>I many other citizens of Redondo Beach would like to see the AES Power Plant to shut down as early as possible. The power plant is scheduled to shut down at the end of this year on December 31, 2020.</p> <p>I have worked hard to be able to live in Redondo Beach and have been saddened by the presence of the power plant ever since I can remember. We do not want any extension on operations for this plant.</p> <p>Please DO NOT extend its operation.</p>	Comment noted. Please see Master Response 2.1.
440.01	We are so disheartened that there is an attempt at yet more delay in shutting down this minimally used plant that is such a polluter of our city and our water. The fine particulate matter that this plant	Comment noted. Please see Master Responses 2.1, 2.3 and 2.5.

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	<p>puts forth affects the health of our community. We were so excited to have it gone and have the chance to remake this area of the waterfront into a beautiful recreational hub for Redondo and the greater community. Please don't put this off any longer. I'm in my 50s. I'd like a chance to experience the positive transformation of our city that will occur once this plant is gone. I feel like AES and the new owner of this site are in it for the profits, while residents are left with this polluting eyesore. How many more years to we have to keep fighting these deep pocket polluters? Please retire this plant at the end of the year, as we fought for.</p>	
441.01	<p>The AES Redondo Power Plant should NOT be extended beyond December 2020!</p>	<p>Comment noted.</p>
441.02	<p>AES Redondo is a gas-fired, 1950s-technology power generation plant, the least efficient and most polluting per kilowatt of any coastal plant still running.</p>	<p>Please see Master Response 2.2.</p>
441.03	<p>While there is little opposition to extending the lives of the other three coastal power plants subject to the CPUC's request, the City of Redondo Beach had a deal with the owner of the plant to purchase half of the land it occupies for conversion to public</p>	<p>Please see Master Response 2.4.</p>

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	open space and restored wetlands (as directed by the California Coastal Commission).	
441.04	AES Redondo is located in the most densely populated area on the California coast, with all four sides of the plant bordered with residential homes. There are 21,000 people living within a one-mile radius of the AES Redondo plant, more than live within the same one-mile radius of all three of the other coastal power plants combined!	Comment noted. Please see Master Response 2.1.
441.05	In addition, the CPUC has not demonstrated that the extension of AES Redondo's operating life is necessary to maintaining our power-grid reliability.	Please see Master Response 2.2.
441.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi, State Senator Ben Allen, and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Please see Master Response 2.1.
441.07	Please vote NO on this proposed extension.	Please see Master Response 2.1.
442.01	I have been a resident of Redondo Beach for 12 years and have been frustrated by the back and forth on the AES Plant Shutdown. As a concerned	Comment noted.

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	<p>citizen with the health and well- being of my family in mind and a desire to see a development that caters to the residents on the area, I have voted on removing the plant.</p>	
442.02	<p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	Please see Master Response 2.1.
442.03	<p>With that said, I urge you to listen to the citizens of this community and stop vacillating. Let's remove the plant now.</p>	Comment noted.
443.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p>	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
443.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
443.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p>	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
443.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
443.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.4 and 2.5.
443.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality,</p>	Please see Master Responses 2.3 and 2.4.

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Letter and Comment Number	Comment	Response
	help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	
443.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
443.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
444.01	<p>As a 15 year resident of Redondo Beach I ask that you deny AES the 3 year extension they are requesting.</p> <p>The South Bay has endured many negative environmental impacts from the operation of this plant, from air quality to marine habitat disruption. For these reasons and many more, I am eager for this site to be decommissioned.</p>	Comment noted. Please see Master Responses 2.3 and 2.5.
445.01	This email is to respectfully request the Board DENIES any operation extension of the Redondo Beach power plant. We residents of the South Bay would love to see this local gas plant closed by 12/31/2020 as it was planned a decade ago. The	Comment noted. Please see Master Response 2.1, 2.2 and 2.5.

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	<p>many reasons justifying the cease of operations you may know them very well by now.</p> <p>AES and/or the new owner knew of the planned 12/31/2020 closure and had plenty of time to make other physical and/or monetary arrangements that SADLY only benefits AES and/or the new owner. Residents and visitors to the South Bay have endured for over 50 years the power plant pollution it generates. Isn't that enough?</p> <p>Please DENY any operation extension.</p>	
446.01	I most emphatically urge the Honorable Water Board Members to allow the AES Plants scheduled to be retired in December, 2020 to actually be finally retired.	Comment noted.
446.02	<p>I have lived near the Redondo Beach AES plant for decades. There is so much pollution emitted by that plant, that my trees are always covered with a thick layer of soot.</p> <p>There's soot all over, we are breathing it in day and night. It's carcinogenic. It's poisoning the citizens, both young and old. It's fine as talcum powder, It seeps into our houses, clings to our clothes, coats the bottom of our shoes.</p>	Please see Master Responses 2.3 and 2.5.

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	<p>And the power plant releases the water it uses for cooling back into the ocean. That water is hot, altering the ocean’s environment, negatively affecting living things there too.</p> <p>And for what? They claim they’re indispensable, but they’ve operated in stops and starts for years, winter or summer. They make noise and soot. Little else.</p>	
446.03	<p>Please consider the ocean, consider the humans. You have the power to make a positive change. We are losing the battle for the environment. Don’t contribute to that loss.</p>	Please see Master Responses 2.3 and 2.5.
447.01	<p>We are writing this email to oppose the extension of the retirement of the Redondo Beach AES Plant. We live right next to the plant, even though we live in South Hermosa Beach. We oppose the extension for the following reasons:</p>	Comment noted.
447.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p>	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
447.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
447.04	A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
447.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
447.06	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.4 and 2.5.

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Letter and Comment Number	Comment	Response
447.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
447.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
447.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
448.01	<p>Myself and The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation and Ocean Fever Foundation are all opposed to any extension of operations at AES.</p>	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
448.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant.</p> <p>The residents of Redondo Beach and the Redondo Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
448.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the</p>	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
	<p>number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
448.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
448.05	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.4 and 2.5.
448.06	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Please see Master Responses 2.3 and 2.4.

Table 7 – Comment Letters 400 to 499
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Letter and Comment Number	Comment	Response
448.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
448.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
449.01	I am writing to oppose any extension of the AES plant. The facility should not be allowed to operate beyond Dec. 2020. I live within 5 blocks of this plant and have watched the air being polluted for years. As a Hermosa Beach resident and property owner of over 40 years, I hope you will vote to not extend the operation of this plant.	Comment noted. Please see Master Responses 2.1 and 2.5.
450.01	<p>I strongly oppose the extension of retirement of the AES plant in Redondo Beach.</p> <p>The plant is super old, is polluting our air, is also very noisy and it's time to start thinking about healing our earth during this unprecedented time.</p> <p>Listen to the residents please! Do the right thing.</p>	Comment noted. Please see Master Responses 2.1 and 2.5.
451.01	No AES extension!!!!	Comment noted.

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Letter and Comment Number	Comment	Response
452.01	<p>We have been a long time resident of Redondo Beach. It is a great place to live with one exception. The Power Plant is becoming a Rusting Hulk. No amount of effort could help improve it's current footprint in our city. It is an eyesore from everywhere in the city.</p> <p>This Power Plant has long served it's time. Redondo Beach doesn't get any of the power generated from the Power Plant yet we are subject to the eyesore.</p> <p>The Power Plant also spews vapors, and fall out from time to time. It is unhealthy as well as unsightly. Some of the fallout has left spots on our cars.</p> <p>We should not be subject to this past the agreed date of Dec. 2020.</p> <p>If you lived in Redondo Beach you would understand why we should not be subject to this unhealthy eyesore any longer.</p>	Comment. Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
453.01	The Redondo Beach AES power plant must go. Please uphold promises made long ago, and please side with public health over corporate greed!	Comment noted. Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
454.01	I totally oppose any extension for the AES power plant in Redondo Beach, CA. Why? Because it is a noisy eyesore that pollutes our ocean and our air, and has blighted our waterfront for decades. It kills everything that enters the 14-foot diameter intake structures that draw in seawater to cool their operations. It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise that scares and awakens everyone nearby at all hours of the night. This behemoth must go.	Comment noted. Please see Master Responses 2.1 and 2.5.
455.01	NO AES EXTENSION	Comment noted.
456.01	I write to express my adamant opposition to extending the operation of AES Redondo Beach. The Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) presented several alternatives to extending the operation of AES Redondo Beach.	Comment noted. Please see Master Response 2.1.
456.02	This analysis showed "MW needed from OTC power plants" was 2750 MW in 2021, 2225 MW in 2022, and 1400 MW in 2023. This level of grid assurance can be achieved with zero extension to AES Redondo Beach. The combination of the	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
	<p>power plants in Ormond, Alamitos, and Huntington Beach produces 2883 MW per year. Hence, a three year extension of Ormond, Alamitos, and Huntington Beach, at 2883 MW per year, exceeds the needs for 2021 (2750 MW), 2022 (2225 MW), and 2023 (1400 MW). The State's own analysis proves there is no need for any extension of AES Redondo Beach whatsoever.</p>	
456.03	<p>Ten years ago, the Water Board set a requirement that OTC power plants close by the end of 2020. If any extensions are needed, they should be prioritized and based on proven engineering necessity. The Redondo Beach plant has several unique characteristics that should make it the last resort for any extension. Of the four OTC plants under consideration, Redondo Beach is the only one surrounded tightly by dense residential communities that are incompatible with air pollution emitted by the power plant. Only the Redondo Beach location has an active wetlands and only the Redondo Beach location has water outlets that dump into a nearby underwater canyon which is important for several marine species. Of the four, the Redondo Beach plant is the least efficient, meaning it kills more marine wildlife and emits more air pollutants per MWHR than the other three plants. Since engineering demand can be met with</p>	<p>Please see Master Responses 2.1, 2.2, 2.3 and 2.4.</p>

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	the other three plants, there is no need to extend operation of AES Redondo Beach.	
456.04	Redondo Beach has a once-in-a-lifetime opportunity to reinvent its waterfront and create a world-class destination that balances nature, wetlands, parks, and commercial development. Please do not jeopardize this opportunity by peddling to the insular demands of an energy company and a real estate developer. Please do not extend the operation of AES Redondo Beach.	Comment noted. Please see Master Responses 2.1 and 2.3.
457.01	<p>The AES power plant in Redondo Beach is an outdated eyesore that needs to be demolished immediately! It is useless in this new era of green energy and is also a polluter of the environment! Not to mention it has been spewing out a nasty "trash like" smell on a daily basis for the last month!</p> <p>Get rid of this useless, outdated eyesore once and for all and do something more "progressive" and useful with the land area which the power plant now sits!</p>	Comment noted. Please see Master Response 2.1, 2.2 and 2.5.
458.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Comment noted.

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Letter and Comment Number	Comment	Response
458.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still running.	Please see Master Response 2.2.
458.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please see Master Response 2.1.
458.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Response 2.4.
458.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.

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Letter and Comment Number	Comment	Response
458.06	<p>The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.</p>	Please see Master Response 2.1.
459.01	<p>I wish to register my strong objection to any extension to the closure date of the Redondo AES Power Plant.</p>	Comment noted.
459.02	<p>The plant is a public health and environmental hazard. It is an eyesore which should be a source of shame for all involved. We're lucky to have been gifted one of the most beautiful places on the planet to live in, and this monstrosity is what we do with that privilege. Disgraceful.</p> <p>It is time for a supposedly developed economy like that in California to move away from such energy provision and set an example to the rest of the world.</p> <p>Stop operating the plant, as already agreed.</p>	Please see Master Responses 2.1, 2.3 and 2.5.

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Letter and Comment Number	Comment	Response
459.03	Put in place remedial action to restore the land to a condition which adds value to the environment and the community.	Please see Master Response 2.1.
460.01	<p>As a 45 year resident of the South Bay, I have had to endure the unsightly building, smoke stacks, explosive noises released, wires and odor from this defunct and unneeded utility. The chicanery that has allowed this monstrosity to spew waters into the bay has killed marine life and blocked off a parcel of land that should be shared with the residents of the South Bay. Hermosa Beach is the most densely populated area along the ocean in Southern California, and although this smoking monolith is listed in Redondo Beach, it has been blocking our ocean views and enjoyment of the Redondo Marina for over 80 years. This piece of equipment is outdated and does not serve any public interest.</p> <p>Please allow us to proceed with the removal of this defunct power plant immediately and not allow any extensions!</p>	Please see Master Responses 2.1, 2.3 and 2.5.
461.01	We residents of Redondo Beach have suffered the ill effects of noise and especially particulate pollution in our City for far too long. Just because we the people have been long-suffering, especially considering that the ill effects of particulate	Comment noted. Please see Master Responses 2.1, 2.2 and 2.5.

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Letter and Comment Number	Comment	Response
	<p>pollution has caused more cardiac arrests/heart failure in our area than the incidence of breast cancer, we have unanimously voted to shut down the AES Power Plant. Its electricity is not needed by us, more have come on line, as close as El Segundo, and, in fact, AES supplies outlying areas only, on an "as needed basis". This very limited "as needed" basis does not justify the harmful effects it has caused. How many times must we the people put this before you for it to be enacted?</p>	
462.01	<p>We live in Redondo Beach, CA. For over 20 years we lived right down the street from the power plant.</p> <p>The power plant was scheduled to close down permanently at the end of this year Dec 31, 2020.</p> <p>We have worked on this for decades. We are tired of the plant's loud noise, the thick black smoke and the emissions that cause breathing problems.</p> <p>Please close it down.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5.</p>
463.01	<p>We live next door to AES and the toxic Fumes impact us negatively. We r elderly as well. Please close the plant by Dec. 2020 as originally promised.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5.</p>

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Letter and Comment Number	Comment	Response
464.01	Please keep the agreement in place & CLOSE the AS Power Plant on time December 2020.	Comment noted. Please see Master Response 2.1.
465.01	PLEASE do not give an extension. There is no justifiable reason to keep this plant operating!	Comment noted. Please see Master Responses 2.1 and 2.2.
466.01	I am writing this email to oppose any extension of operations of the AES power plant. The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease permanently at that time.	Comment noted. Please see Master Response 2.1.
466.02	The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.	Comment noted. Please see Master Responses 2.1, 2.3 and 2.5.
466.03	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.4 and 2.5.
466.04	Please do the right thing for both the people and the planet.	Comment noted.

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Letter and Comment Number	Comment	Response
467.01	For the safety of our family, community, as well as our ocean, my family is strongly opposed to the possible extension for the AES power plant in Redondo Beach. We strongly support the planned retirement of it December 31, 2020.	Comment noted. Please see Master Response 2.1.
468.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Comment noted. Please see Master Response 2.1.
468.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most poluting per kilowatt of any coastal plant still running.	Please see Master Response 2.2.
468.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please see Master Response 2.1.
468.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open	Please see Master Responses 2.1 and 2.4.

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Letter and Comment Number	Comment	Response
	space and restored wetlands (as directed by the California Coastal Commission).	
468.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.
468.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Please see Master Response 2.1.
469.01	I'm writing in support of ceasing operations at the Redondo Beach AES power plant by December 2020.	Comment noted. Please see Master Response 2.1.
469.02	It's my understanding that AES Redondo is a gas-fired, 1950s-technology power generating station, the least efficient and most polluting per kilowatt of any coastal plant still running. AES Redondo is located in the most densely-populated area of the California coast. There are 21,000 people living	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>within a mile radius of AES Redondo, including my elderly parents, my niece, dozens of lifelong friends, my wife and I. I understand this is more people than are living within that distance of all three of the other California power plants in question, combined.</p>	
469.03	<p>There is little opposition to extending the lives of the other three plants subject to the CPUC's request, but to my knowledge, they have not demonstrated that extension of AES Redondo's operating life is necessary to maintain power-grid reliability.</p>	<p>Please see Master Response 2.2.</p>
469.04	<p>On a personal note, I grew up in Hermosa Beach and attended Redondo Union High School; I'm now a homeowner and rental property owner in Redondo Beach. I've surfed, skateboarded and biked up and down this section of coast my entire life, and over my 40 years, a regular conversation with local friends and family has always been how incredible it will be when we're able to repurpose the AES site for uses more in tune with our modern community. Now it seems we have the right owner/developer lined up to help make this a reality. Please help us to finally move forward without further delays.</p>	<p>Comment noted. Please see Master Response 2.1.</p>

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Letter and Comment Number	Comment	Response
470.01	As my neighbors and I have discussed, we are OPPOSED to further operation of the AES power plant. The reasons are numerous.	Comment noted.
470.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Please see Master Response 2.1.
470.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	Please see Master Responses 2.1, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
	<p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
470.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will improve.</p>	Please see Master Response 2.5.
470.05	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	Please see Master Responses 2.3 and 2.4.

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Letter and Comment Number	Comment	Response
470.06	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state’s power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
471.01	Please vote to shut down the AES power plant in Redondo Beach. We as a city wish to move forward in revitalizing that area that for environmental benefits both for the current and future generations. The utility of this utility has proven to be minimal at best while its infrastructure is not only appearing to be poor but is incompatible with its vicinity to the coast. Moreover as a homeowner with young children I worry about the environmental and health detriments from living in close proximity to the plant. Please consider my request that the plant cease its operation.	Comment noted. Please see Master Responses 2.1 and 2.5.
472.01	I am writing to voice my support for the closure of the AES power plant in Redondo Beach and I oppose any extension of the operational timeline. I live near the plant on the south side of Hermosa Beach and the plant is an extreme eye sore not to mention the extreme noise that is generated at odd hours of the night so they can avoid complaints to the SCAQMD and anyone from performing a reliable Visible Emissions Evaluation. I am an environmental engineer by profession and have	Comment noted. Please see Master Responses 2.1 and 2.5.

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	worked in various sectors from oil and gas to aerospace and I fully support retiring this plant at the previously agreed upon date of 12/31/2020.	
473.01	Please do not allow any extension of operations for the AES plant in Redondo Beach. It's time for a change.	Comment noted.
474.01	I am a resident of Redondo Beach, CA. I am writing to ask the State Water Board to not allow any extensions for the Power Plant to continue to operate with reactors that are outdated and set to retire on December 31, 2020.	Comment noted.
474.02	<p>The power plant area has been greatly contested in Redondo Beach and the South Bay as whole. Mainly by Big Corporate investors versus the citizens of the South Bay communities.</p> <p>This powerplant is hardly in use, is a huge eyesore, and needs to gone. It is time that the residents of Redondo Beach and the South Bay have a say in it's future. Retire these reactors now and let's give some of this land back to the community.</p>	Comment noted. Please see Master Response 2.1.
475.01	I am adamantly opposed to any extension of the AES Redondo Beach Generating Station ("AES	Comment noted. Please see Master Response 2.1.

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	<p>RB power plant") beyond the scheduled closure date of Dec. 31, 2020.</p> <p>10 years ago the retirement date of the AES power plant was proposed as Dec. 31, 2018 and at that time an extended closure date of Dec. 31, 2020 was decided and agreed upon by the community, AES and all stakeholders.</p>	
475.02	<p>AES Redondo Beach was built in 1954, one of the oldest gas-fired plants in California and it is the least efficient and most environmentally damaging of the plants being considered for extension. Removing the comparatively small AES Redondo Beach power plant will not have an adverse effect on grid reliability. The closure of AES RB (848 MW) can easily be covered by the unused 95+% capacity of the larger plants (Alamitos 1,163 MW; Ormond 1,516 MW). Your own Staff report's analysis of grid reliability does not support extending the AES RB power plant compliance deadline under the OTC Policy.</p>	Please see Master Response 2.2.
475.03	<p>The environmental damage from the AES Redondo Beach power plant emits a significant amount of pollutants into our dense urban area. The AES Redondo Beach power plant is located in the most dense, urban location impacting the most</p>	Please see Master Responses 2.1 and 2.5.

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	residents, homes and schools of any of the proposed power plants considered for extension.	
475.04	I would really like to see the current site of the AES Redondo Beach power plant be revitalized into something that can be enjoyed by residents of Redondo Beach and improve the blight of the current power plant on our coastline. The sooner the AES power plant is closed, the sooner the revitalization can occur and I am in favor of that.	Comment noted. Please see Master Response 2.1.
475.05	The city of Redondo Beach has gone to great lengths already working with Southern California Edison (SCE) on a study to plan for the removal of the unsightly 220KV high voltage power lines that connect to the AES power plant and have long been an eyesore in the city of Redondo Beach. That can begin immediately after the closure of the power plant. The city of Redondo Beach has also been working diligently and in good faith effort with the new owners of the AES power plant in negotiations. To date the city has worked to secure funds from the state and through a new Enhanced Infrastructure Financing District (EIFD) to revitalize the AES Redondo Beach site after the power plant is permanently retired. All of this work by the city has been towards a closure date of Dec. 31, 2020 and that date should not be extended.	Please see Master Response 2.1.

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475.06	So in summary, the AES Redondo Beach power plant should not be extended even one day beyond the Dec. 31, 2020 closure date that was agreed to 10 years ago.	Comment noted.
475.07	This power plant is not necessary even as back-up, it is the oldest and most polluting of the power plants being considered for extension and it is located in the densest area with the greatest negative impact to the largest number of residents who have had to deal with a power plant as a neighbor for the last 66 years. The time has come to permanently retire the AES Redondo Beach power plant.	Please see Master Responses 2.1, 2.2, 2.3 and 2.5.
476.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Comment noted.
476.02	Redondo Beach's Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any	Please see Master Responses 2.2 and 2.3.

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	of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	
476.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	Please see Master Response 2.4.
476.04	The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.	Please see Master Responses 2.4 and 2.5.
476.05	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond	Please see Master Response 2.4

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	December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	
476.06	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
476.07	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p>	Please see Master Response 2.2.
476.08	<p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach</p>	Comment noted.

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	<p>Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace."</p>	
477.01	<p>I oppose any extension of the power plant in Redondo Beach.</p> <p>I have lived in Hermosa Beach for the last 11 years. I can't tell you how many times I have been awoken by the loud gas venting at night. It sounds like a jet engine and wakes everyone up in the neighborhood. I have been counting down the days until the AES plant is decommissioned.</p> <p>My only hope is that you decide to stick to the original date of 12/31/2020 and not extend the power plant's life - at the expense of the health and well-being of the residential neighborhoods close by.</p>	<p>Comment noted. Please see Master Responses 2.1.</p>
478.01	<p>I support the Hermosa Beach and Redondo Beach unanimous vote to oppose the extension. It's time to retire the AES power plant per the agreement 10 years ago. I oppose the extension.</p> <p>I have been a long-time resident of Hermosa Beach and have resided a few blocks from the power plant for many years. The power plant is not just an eye sore, it's a huge disturbance! The loud</p>	<p>Comment noted. Please see Master Response 2.1.</p>

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	<p>shrieking whistle that blows at the most random late night/early morning hours has kept us up for countless nights with their excessive noise pollution. AES is a bad neighbor. It's time for them to go!</p>	
479.01	<p>I am writing this email to ask you to consider shutting down the Redondo Beach AES plant in 2020.</p> <p>The plant is polluting your community!</p>	<p>Comment noted. Please see Master Response 2.1.</p>
480.01	<p>As a 26 year resident of Redondo Beach and a life long environmental activist I urge you TO NOT allow the AES power plant to continue to operate PAST the established date of December 31st 2020.</p>	<p>Comment noted.</p>
480.02	<p>It was DETERMINED over 10 YEARS ago that this plant and its outmoded use of operation is NOT ONLY destroying our Ocean, but has poured TONS of Particulates into our AIR and WATER. NO amount of MONIES nor "supposed abatement" techniques can give the nearby 21,000 residents and the surrounding communities of 175,000+ people their health and their well being back.</p> <p>As a member of a BOARD of regulators, you duty is to the citizens that you were chosen to represent. I hereby call on you TODAY to allow the</p>	<p>Please see Master Responses 2.3 and 2.5.</p>

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	<p>City of Redondo Beach to continue its work to REPLACE this gross polluter with a Park and appropriate development for the communities that now surround this aging , NOISY,(when it releases its toxic steam over 110db which is damaging to all ears over 5 minutes) smelly, and deadly polluting power plant.</p> <p>I remind you that the WORST particulants spew from this dinosaur- PM 10s and PM 12s. Both attack the lungs and circulatory system of all- particularly children and those over 40.... THE majority of the RESIDENTS of Redondo Beach... In this time of Pandemic, when our whole way of LIFE is in danger, do NOT add to this cluster of pain and DEATH.</p>	
481.01	Please do not renew the extension of closure for the AES polluting eyesore. Thank you.	Comment noted. Please see Master Response 2.1.
482.01	<p>I am writing to express opposition to extending the closure of AES in Redondo Beach. A facility that employs outdated equipment and obsolete machinery, contributing to the degradation of local air quality does not deserve a reprieve.</p> <p>Please do the right thing for this community and California, and retire the facility as soon as possible.</p>	Comment noted. Please see Master Response 2.5.

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483.01	<p>We live within 'earshot' of the AES Powerplant in Redondo Beach, residing at 316 Monterey Blvd in Hermosa Beach. In past years, when the powerplant has been operating we are treated to extremely loud noises when this ancient and apparently decrepit powerplant must vent steam to avoid a boiler explosion.</p>	Please see Master Response 2.1.
483.02	<p>Thank God it has been taken out of service for this past year and sold. The idea that the purchasers of this relic might want to operate it for another 3 years is an abomination to us.</p> <p>Apparently they must feel that their investment might be worth more money to them if they could hold on to it for appreciation, or that they might find a way to avoid the costs of demolition and land restoration of the powerplant site.</p> <p>Please DO NOT grant this extension.</p>	Please see Master Response 2.1. The Redondo Beach facility has continued to operate during 2020 after the property was sold to SLH.
484.01	<p>Please do not extend the operational use of the AES power plant in Redondo Beach as a power plant past the previously agreed-upon December 30, 2020 end of use deadline. I am a resident in Redondo Beach living within 1/4 mile of the power plant. I have two small children and asthma. Particulates from this power plant blow right up the hill to my children's elementary school which we</p>	Comment noted. Please see Master Responses 2.1 and 2.5.

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	<p>have to walk to because there are no buses in this area. Particulates fall down upon our small property where, because no one has air-conditioning, we have our windows open most of the year. We are exposed to the pollutants as we play outside as a family, walk to the grocery store/dry cleaner/ post office/drugstore/UPS store down the street, walk to school, play in the nearby parks and beach. Yes when we bought our property several years ago we knew the power plant was here but that it operated very infrequently and only on the hottest days of the summer and was on its way to retirement. There are many many reasons the operational date should not be extended; the only reason to keep it is corporate greed. It has been proven through many state and private agencies that the little power this plant produces is not needed.</p>	
484.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p>	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
484.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.
484.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p>	Please see Master Response 2.5.

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	<p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
484.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1 and 2.4.
484.06	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	Please see Master Responses 2.4 and 2.5.
484.07	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality,</p>	Please see Master Responses 2.3 and 2.4.

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	help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	
484.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
484.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
485.01	<p>We are Redondo Beach residents who strongly urge the closure of the AES power plant as scheduled.</p> <p>The plant serves no needful purpose, pollutes our air and ocean. It is an ugly stain on our waterfront that needs to be eliminated ASAP!</p>	Comment noted. Please see Master Responses 2.1, 2.2, 2.3 and 2.5.
486.01	Please do not extend the operation of the Redondo Beach Power Plant. The facility is environmentally unsound.	Comment noted. Please see Master Responses 2.1, 2.3 and 2.5.

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Letter and Comment Number	Comment	Response
487.01	Greetings! I hope this letter finds you well and in good spirits. My name is Michael Lee, and at the time of writing this letter, I am a sophomore attending Redondo Union High School. I am sure it's already apparent to you on what I will say within this letter, but it's in opposition to any extension of Redondo Beach's power plant. I don't know any of you guys personally, but what I can assume is that you've all been consumed by greed. I don't hate any of you for this, but I hope it's early enough to change your minds. This power plant has polluted our air and ocean for long enough. You guys are indirectly killing life, not just people. I beg of you to grasp onto the small amount of humanity you have left and help the common people out. Discontinue the power plant and let the City take care of things from there. I beg of you for the future.	Comment noted. Please see Master Responses 2.3 and 2.5. Additionally, please see response to comment 276.01.
488.01	Please do not extend the life of the AES Redondo power plant beyond the December 2020 date agreed to a decade ago. This assault on our environment has dragged on far too long already.	Comment noted. Please see Master Response 2.3.
489.01	I write to express my vehement opposition to any extension of the AES Redondo Beach Generating Station's compliance deadline under the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (OTC	Comment noted. Please see Master Responses 2.2, 2.3, and 2.5.

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	<p>Policy). The RBGS is unnecessary to ensure the reliability of the State’s electric supply, emits a significant amount of pollutants in a dense urban area, and significantly impairs water quality and the beneficial uses of King Harbor. For these reasons, and others to be provided in the following bullet points, I respectfully requests that the State Water Resources Control Board modify the Staff Alternative Five to omit the one year extension for the RBGS under the proposed amendment to the OTC Policy.</p>	
489.02	<p>AES Redondo is a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still running.</p>	<p>Please see Master Response 2.2.</p>
489.03	<p>AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.</p>	<p>Comment noted. Please see Master Response 2.1.</p>
489.04	<p>There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a</p>	<p>Please see Master Response 2.4.</p>

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	deal with the owner of the plant to purchase half of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	
489.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.
489.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Please see Master Response 2.1.
490.01	As a resident of Southern California, public health and the health of our ocean, beaches, and marine life are very important to me. I urge you to protect both our communities and marine life along our California coast by not extending the ocean water cooling compliance deadline at the AES-Redondo	Comment noted. Please see Master Responses 2.3 and 2.5.

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	<p>Beach, AES-Alamitos, and AES Huntington Beach power plants past this year.</p>	
490.02	<p>While I agree with the goal of grid reliability, these once-through cooling (OTC) generating stations are not critical to grid reliability as there are plenty of other sources of electricity in Southern California. The deadline was set ten years ago, giving AES and SoCal Edison plenty of time to prepare, and despite the protests of the fossil fuel industry, we are now in position to safely shut down these harmful stations.</p> <p>The OTC generating stations at Alamitos and Huntington Beach have largely been replaced already. At Alamitos, three of six units have already been taken offline. At Huntington Beach three of four have been decommissioned.</p>	Please see Master Response 2.2.
490.03	<p>The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity in 2018. The fact that it has been sold and will be permanently closed is more evidence that it is already unnecessary.</p> <p>With the recent news that SoCal Edison has 770 megawatts of new battery storage coming online by August 1, 2021, the need for these plants for grid reliability will be reduced even further.</p>	Please see Master Response 2.2.

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490.04	Besides the damage to marine life, these plants damage public health and contribute to climate change. California has been a leader in addressing climate change, setting a clear goal to achieve 100% renewable energy. Extending this deadline would be a step in the wrong direction.	Please see Master Responses 2.3 and 2.5.
491.01	Please do not extend their operation deadline.	Comment noted.
491.02	Environmental: through-water cooling harms the natural fisheries	Please see Master Response 2.3.
491.03	Noise: the plant frequently releases gasses in an extremely loud fashion	Please see Master Response 2.1.
491.04	Air pollution: the plant frequently releases gasses in an extremely loud fashion	Please see Master Responses 2.1 and 2.5.
491.05	Inefficient: residential solar uptake has kept local power needs relatively flat. The plant rarely runs because it is old and inefficient (costing more than other power sources). It's capacity is not needed for grid security.	Please see Master Response 2.2.
491.06	AES has not been a good corporate citizen of the South Bay playing political tricks regarding their zoning. The Dec 31, 2020 deadline has been known to the community, AES, it's new buyer, and local home	Comment noted. Please see Master Response 2.1.

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	buyers like me for years. One factor in my home purchase was the 2020 deadline. It is hard to imagine a worse location for a polluting power generation station.	
491.07	The Redondo Beach AES site should not be allowed to continue operations past the agreed upon deadline. Extending operations is bad for the environment, our health, and the community. It is only good for the recent buyer of the AES site.	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.
492.01	Please do NOT extend the operating permit for the AES power plant in Redondo Beach! I have been waiting 28 years for the noise and air pollution to stop. It is way past due to close this polluting eye store and create some much needed open space for the residents.	Comment noted. Please see Master Response 2.1.
493.01	Please close this down for the safety of those concerned.	Comment noted. Please see Master Response 2.1.
494.01	<p>A midst this horrible Corona Virus and the drastic steps our community has done to ensure the safety and well-being of our neighbors, you want to go back on your word and keep AES open, that is outrageous!</p> <p>Now is the perfect time to show your good faith and remove the eyesore from Redondo Beach.</p>	Comment noted.

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Letter and Comment Number	Comment	Response
495.01	<p>Hello- I oppose the extension of the powerplant closing. Please do right by the residents of redondo beach and close down the powerplant by the end of 2020 and do not approve the extension for the following reasons:</p>	<p>Comment noted. Please see Master Response 2.1.</p>
495.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	<p>Please see Master Response 2.1.</p>
495.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its</p>	<p>Please see Master Responses 2.1, 2.3, and 2.5.</p>

Table 7 – Comment Letters 400 to 499
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	<p>operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
495.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
495.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the	Please see Master Responses 2.1 and 2.4.

Table 7 – Comment Letters 400 to 499
 Response to Comments on the Amendment to the
 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

Letter and Comment Number	Comment	Response
	State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
495.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.4 and 2.5.
495.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
495.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
495.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.

Table 7 – Comment Letters 400 to 499
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
496.01	<p>We are totally opposed to ANY extension of the AES plant operations. This is a long term public nuisance that needs to be terminated at the earliest possible date.</p>	<p>Comment noted. Please see Master Response 2.1.</p>
497.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	<p>Please see Master Response 2.1.</p>
497.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its</p>	<p>Please see Master Responses 2.1, 2.3, and 2.5.</p>

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Letter and Comment Number	Comment	Response
	<p>operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
497.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
497.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the	Please see Master Response 2.1.

Table 7 – Comment Letters 400 to 499
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
497.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.4 and 2.5.
497.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
497.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
497.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.

Table 7 – Comment Letters 400 to 499
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Letter and Comment Number	Comment	Response
498.01	Please do not vote to extend the power plant use.	Comment noted.
499.01	<p>Please do not extend the operation and existence of the AES Redondo Beach power plant.</p> <p>I live within 1/4 mile of this power plant. I know first hand the pollution it creates; air pollution, noise pollution and visual pollution.</p> <p>My son suffers from asthma which I suspect was caused by living his entire life next to this power plant. I know the pollution generated from this power plant exacerbates his asthma.</p> <p>Please vote AGAINST extending it's use.</p>	Comment noted. Please see Master Responses 2.1 and 2.5.

Table 8 – Comment Letters 500 to 599
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
500.01	<p>As a Redondo Beach resident, neighbor to the plant and new father I'm very concerned about environmental, and social impact of the AES plant in our city. The plant holds down property values, and uses land that would otherwise improve the livelihoods of RB residents for generations to come.</p> <p>Please do not extend the operation of the AES plant.</p> <p>Please allow the plant to retire December 31st, 2020 as planned.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
501.01	<p>Dear California State Water Resources Board, once the virus is no longer a problem, people will be able to see what is left and the aes plant does not to be the next problem. don't extend the problems. let's clean this up!</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
502.01	<p>A vote to extend the life of the AES power plant monstrosity that penetrates our skyline and spews toxins like a beast is not widely favored. How could this even be on the agenda for consideration?</p> <p>I have made my home in Redondo Beach since 1995. I am raising two children not far from this power plant. I am concerned for their health and the health of the entire South Bay population and</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.</p>

Table 8 – Comment Letters 500 to 599
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	beyond.	
502.02	I've witnessed first hand at the Sea Lab (now closed) the numerous species of marine life saved from the jaws of this monster. Unfortunately, thousands of marine animals were sucked to their death over the decades. This, despite actions from the mostly volunteer staff at the Sea Lab to extract and save these animals. The Sea Lab is now closed as you know. How many more marine animals will perish?	Please see Master Response 2.3.
502.03	<p>Lastly, as a reminder, here is a short list of those opposed to the extension.</p> <p>State Senator Ben Allen and Assembly member Al Muratsuchi have co-signed a letter to the WB opposing any extension, as has Los Angeles County Supervisor, Janice Hahn. The Redondo Beach City Council and School Board, Hermosa Beach City Council and School Board, the Beach Cities Health District, Heal the Bay and the Surfrider Foundation have all publicly announced opposition to any extension of the AES Redondo Beach power plant.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
502.04	Vote from the heart, knowing that this closure will perhaps save the lives of children in the area today and these children will tell their children	Comment noted. Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	about this moment in time when the plant came down and a city rejoiced!	
503.01	Please do not delay the closing of the AES plant in Redondo Beach. It's time and the residents are expecting action.	Please see Master Responses 2.1 and 2.2.
504.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Please see Master Responses 2.1 and 2.2.
504.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most poluting per kilowatt of any coastal plant still running.	Comment noted. Please also see Master Responses 2.2, 2.3, and 2.5.
504.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please see Master Response 2.1.
504.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupys, for conversion to public open	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	space and restored wetlands (as directed by the California Coastal Commission).	
504.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Responses 2.1 and 2.2.
504.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted. Please see Master Responses 2.1 and 2.2.
505.01	I am a lifelong resident of Southern California and currently reside in Redondo Beach. It has come to my attention that there is a proposed closure extension of the operation of the Redondo Beach power plant. I strongly urge you to NOT grant this extension. For the health and safety of residents of the South Bay this plant should be permanently closed effective December 31, 2020.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
505.02	Surely given our current environmental	Comment noted. Please see Master Responses 2.1,

Table 8 – Comment Letters 500 to 599
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Letter and Comment Number	Comment	Response
	<p>circumstances and the hardships we are all enduring during the COVID-19 pandemic, this is a simple fix: close this plant. As a parent and teacher this is critical for our younger generations.</p>	<p>2.2, 2.3, and 2.5.</p>
<p>506.01</p>	<p>I ask respectfully but emphatically that you please refrain from any delay in retiring the AES power plant. I have lived in my current home since 1984, with a view from my roof of this hideous plant churning out unwelcome and unhealthy particulates into the community. There are cleaner choices available now, including my own rooftop solar panels that for years have supplied more than the amount of energy my home and three electric cars require.</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.</p>
<p>507.01</p>	<p>I respectfully request that you not extend the deadline for AES to close the Redondo power plant by December 31, 2020. I also request that you require AES and the new owner of the property to quickly and safely remove the power plant and power lines as early as possible in 2021.</p> <p>I Have raised two daughters born and raised in Redondo Beach. My daughters now live about a mile away from the power plant, are adults raising their families. Sadly They see the smoke from power plant and loud noises coming from it at</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>various hours of the day and late night.</p> <p>The plant has blighted our waterfront for decades and it's time for it to be closed and removed.</p> <p>I am also hearing it is affecting our sea life which is very upsetting.</p>	
508.01	Please do not extend the operations at the AES power plant past the planned termination of 2020.	Please see Master Responses 2.1 and 2.2.
508.02	<p>The toxic plume coming from the AES REDONDO BEACH smokestacks is invisible (on most days to the naked eye) but, do not be fooled, it is a toxic cocktail that does not have time to dissipate before entering into our lungs. Please consider the air quality in our area in addition to water quality. It's time to retire this plant once and for all because of it's proximity to a dense population.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
509.01	Please retire the Redondo Beach Power Plant now.	Please see Master Responses 2.1 and 2.2.
509.02	<p>The natural gas that it runs on is not as clean as Corporations have led us to believe. Natural Gas is still a Fossil Fuel!</p> <p>Did you know that large amounts of Methane, which is one of the most powerful green house gas, is released into the ozone when the national</p>	Comment noted. Please see Master Responses 2.1 and 2.5.

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	<p>gas is extracted and transported. The amount of Methane, in our atmosphere, has grown expediently since the US started fracking!</p> <p>In many cases, the water tables for many areas are being polluted by the chemicals that are used to extract the gas. Some areas where drilling occurs have experienced increases of hazardous air pollutants and two of the Six “critical pollutants.”</p> <p>When Power Plants burn Natural Gas, it releases Carbon Dioxides that prevents new Ozone molecules from forming. No new Ozone molecules, no way to repair the Ozone!</p> <p>Nitrogen Oxides are also released which is a precursor to smog, which is so bad for our health!</p>	
509.03	<p>Why keep these, gas burning, environment destroying, Power Plants open and running when there are more Reliable sources of cheaper, Renewable Energy available? Also, new sources are being developed as we speak!</p>	<p>Comment noted. Please also see Master Response 2.2.</p>
509.04	<p>It’s been over a year since the Redondo Beach Power Plant was to close.</p>	<p>Please see Master Responses 2.1 and 2.2. Furthermore, the current compliance date in the OTC Policy is December 31, 2020.</p>
509.05	<p>It’s time to close it for good. When it’s gone, we</p>	<p>Comment noted. Please see Master Responses 2.1,</p>

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Letter and Comment Number	Comment	Response
	will be one step closer to saving our Planet!	2.2, 2.3, and 2.5.
510.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
510.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.	
510.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
510.04	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are	Comment noted. Please also see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
510.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Response 2.4.
510.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
510.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
510.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
510.09	I am a resident of Redondo Beach and I am asking you to honor the existing date of ceasing power plant operations of 12/31/2020 for these	Comment noted. Please also see Master Responses 2.1 and 2.2.

Table 8 – Comment Letters 500 to 599
 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	reasons.	
511.01	We are writing about the damage to our air quality affecting Los Angeles beaches with the active AES plant in Redondo Beach. This toxicity has no place nor need in a high density neighborhood bordering our natural resource of the ocean. Tens of thousands people reside here and even more visit the beach. This is a travesty on any day, now add our current shelter in place when the earth is actually healing.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
511.02	Shame on AES and their supporters. Do not allow them to continue to pump hazardous chemicals into our air, that actual human beings breathe!	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
511.03	This air pollution travels through to you too, into the greater Los Angeles area. Keep us healthy and safe!	Comment noted. Please also see Master Response 2.5.
512.01	We are writing about the damage to our air quality affecting Los Angeles beaches with the active AES plant in Redondo Beach. This toxicity has no place nor need in a high density neighborhood bordering our natural resource of the ocean. Tens of thousands people reside here and even more visit the beach. This is a travesty on any day, now add our current shelter in place when the earth is actually healing.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.

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512.02	Shame on AES and their supporters. Do not allow them to continue to pump hazardous chemicals into our air, that actual human beings breathe!	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
512.03	This air pollution travels through to you too, into the greater Los Angeles area. Keep us healthy and safe!	Comment noted. Please also see Master Response 2.5.
513.01	This morning as I was walking my dog, I looked across at the polluting eyesore that is the old Power Plant, and wondered how beautiful Redondo Beach will be once it is removed.	Comment noted. Please also see Master Responses 2.1 and 2.2.
513.02	You can only imagine how disgusted I am to think that an extension is being considered.	Comment noted. Please also see Master Responses 2.1 and 2.2.
513.03	This polluting, hideous monstrosity has been here too long already and I am sure you would not want this in your backyard. There is nothing good in it for the residents of Redondo Beach and the surrounding areas, and I implore you to bring this plant to closure.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
514.01	I urge you to NOT extend the retirement of the AES power plant in Redondo Beach past December 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
514.02	Doing so would not serve the residents in surrounding areas. The time has long passed for this power plant to be retired. We as a community	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
	have had enough air and water pollution and particulates in the air we breath produced by this power plant for decades.	
514.03	Its time has come and gone. For many years now it has been operating at an extremely low capacity.	Comment noted. Please also see Master Responses 2.1 and 2.2.
514.04	There is no justification for an extension. Please uphold it being retired as scheduled in 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
515.01	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES. The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p> <p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5. Please also see responses for Comments 510.01 through 510.09.

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 Response to Comments on the Amendment to the
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Letter and Comment Number	Comment	Response
	<p>Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses. The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p> <p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile Area. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California. It’s clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public’s health will benefit.</p> <p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to</p>	

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	<p>assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p> <p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing Carbon. Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p> <p>They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability. As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.</p>	
516.01	As a resident of South Redondo, I urge you to shut down the AES plant NOW!	Comment noted. Please also see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
516.02	<p>It is old and needs to go for its pollution of our ocean and dangers of health to all local residents.</p> <p>Why? Because it is a noisy eyesore that pollutes our ocean and our air, and has blighted our waterfront for decades. It kills everything that enters the 14-foot diameter intake structures that draw in seawater to cool their operations. It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise that scares and awakens everyone nearby at all hours of the night. This behemoth must go.</p> <p>How about you move and live close to the plant and get your lungs filled with toxic pollution???</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
517.01	I wanted to voice my family's opposition to any extension for the AES Redondo Beach power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
517.02	<p>There is a deadline that the public wants enforced.</p> <p>It's time to move forward.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
518.01	After moving to the South Bay just a few years ago, this place has captured my heart. Paddling down the coast from King Harbor, I always marvel	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	at the beauty of our coast line. However, the beautiful view is always jarred by this big atrocious smoking machine that is the AES power plant. It feels so unbelievably out-of-place and is not fitting to this community at all. Not to mention it destroys our environment and the health of the people who live here.	
518.02	The Redondo Beach city mission states "The City of Redondo Beach is committed to providing the finest services to enhance the quality of life for those who live, work, visit and play in our community." I do not see how this power plant fits into this mission.	Comment noted. Please also see Master Responses 2.1 and 2.2.
518.03	I urge you to oppose the extension of this plant for the betterment of our community, our environment, and our future.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
519.01	<p>I am writing to ask that you vote NOT to extend the retirement date of the AES power plant in Redondo Beach beyond 12/31/2020.</p> <p>I live in Hermosa Beach and am concerned about local air pollution and carbon emissions from the aging units that adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area. There are 21,0000 people living within 1 mile of the AES power plant. The AES</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5. Additionally, please see the responses to comments 510.01 through 510.09.

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	<p>facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area. It’s clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public’s health will benefit. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant. This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon</p>	

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	<p>sink because wetlands are effective at capturing and storing carbon. Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p> <p>I, as a resident of Hermosa Beach, join the Hermosa Beach City Council voicing opposition to the continued operation of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values. I ask that you ensure that operations cease on its scheduled date of 12/31/2020 to cease operation.</p>	
520.01	The AES Redondo power plant has no place in our new world. I demand that the life of the AES Redondo power plant not be extended beyond December 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
521.01	I strongly OPPOSE extending the operation of the AES power plant beyond the scheduled retirement date of December 31, 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
521.02	The Redondo Beach residents have endured air and water pollution produced by this power plant for decades.	Comment noted. Please also see Master Responses 2.3, and 2.5.
521.03	The power plant is antiquated and operates at	Comment noted. Please also see Master Response

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Letter and Comment Number	Comment	Response
	extremely low capacity.	2.2.
521.04	<p>There is no justification for an extension. It is time for it to be retired.</p> <p>I urge you to OPPOSE the extension of AES power plant operations.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
522.01	<p>I moved to Redondo Beach with my family two months ago with the understanding that the power plant will cease its operations at the end of the year.</p> <p>I just found out that some investors had bought the AES plant roughly eight months before it is supposed to close down and now asking for an extension. Our mayor tells us that he hasn't even met these people. I take this as an insult to the people of Redondo Beach and of the entire South Bay.</p> <p>Is this a joke?</p>	Comment noted. Please also see Master Responses 2.1 and 2.2. Please also see Section 5.1 of the Staff Report, which discusses the basis for this amendment, the SACCWIS' recommendation, to extend Redondo Beach's compliance date for one year to address grid reliability concerns starting in 2021. The amendment is not based on AES' or SLH's suggestion that the State Water Board extend Redondo Beach for up to three years.
522.02	In my book, the current board will be held accountable for all future health-related consequences on my family and every other person in the South Bay, if you grant that extension.	Comment noted. Please also see Master Responses 2.1 and 2.2.
523.01	We need this plant shut down asap. Adhere to the	Comment noted. Please also see Master Responses

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	original promised end date of 2020.	2.1 and 2.2.
523.02	<p>Coming from the East Coast, I won't consider buying land until it's gone. It's not helping value especially during this time period. If it was announced that it would be shut down in 2020, this place would become a big hotspot to buy land where it's an unbelievable deal vs other parts of LA.</p> <p>People make fun of new Jersey for having power plants, I never thought a place like this would still have a working plant on the water in a very high end area. It's very odd.</p> <p>I'll buy here if it's gone in 2020 otherwise I'll look elsewhere where there isn't a bloody power plant!</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
524.01	Please shut down the AES site in Redondo Beach as was to have been done at the end of this year!	Comment noted. Please also see Master Responses 2.1 and 2.2.
524.02	Do not allow greedy developers to control our health. This is an important issue.	Comment noted. Please also see Master Responses 2.1 and 2.2.
525.01	For many good reasons, it's beyond time to shut down the plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
525.02	I urge you to deny requests to extend the operation of the plant for 3 more years.	Comment noted. Please also see Master Responses 2.1 and 2.2.

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526.01	AES was given 10 years to close the plant now is the time. No more extensions.	Comment noted. Please also see Master Responses 2.1 and 2.2.
527.01	As a resident of Redondo Beach I would like to advise I am opposed to AES and/or other interested parties to continue operations at the Redondo Beach power plant past their December 31, 2020 deadline.	Comment noted. Please also see Master Responses 2.1 and 2.2.
527.02	Please uphold the mandated retirement deadline of December 31, 2020 in the interest of restoring the quality of California's water resources for the protection of the environment, public health and all beneficial uses for the benefit of present and future generations.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
528.01	Dear California State Water Resources Board, STOP...Lived in my home since 1960... Tired of this hassle..	Comment noted. Please also see Master Responses 2.1 and 2.2.
529.01	Please, Please, Please do not let the AES Redondo Beach power plant stay in operation beyond December 2020. No More Extensions!	Comment noted. Please also see Master Responses 2.1 and 2.2.
529.02	I live a few blocks away and have many concerns about its operations including local air pollution and carbon emissions. I went through chemo in 2017 for cancer. Many of my neighbors have been diagnosed with	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	serious health problems. Please help are neighborhood and ocean be healthier and safer. Would you consider it safe for your parents or families to live near this power plant? Please listen to the voices from the nearby communities. Thank you for your time reading my concerns.	
530.01	I have lived in Hermosa Beach for 37 years and have been a Tax-Paying Homeowner for 33 years. My wife of 37 years and I had and raised our 3 children here through the Local Public School System. We obviously live near the AES Redondo Beach Power Plant and have hoped/wished for all 37 years that somehow, sometime, that this outright Beach Eyesore would be torn down and removed. Over the years, we have heard and read about closures and new plans, etc. for the existing Property. Recently it seemed like all that was going to change and that we South Bay residents were going to get rid of the whole Plant. Please DO NOT extend the life of the AES Power Plant, and cease Operations by the end of 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
530.02	We thought this was a "done deal", but I am asking you, The Powers That Be, to NOT extend the life of The Plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
531.01	Please close the AES plant.	Comment noted. Please also see Master Responses

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		2.1 and 2.2.
532.01	Please....No 3 year extension (in fact, No Extension At All) for AES Power Plant in Redondo Beach on their closure date.	Comment noted. Please also see Master Responses 2.1 and 2.2.
532.02	<p>My wife and I have suffered from the Power Plant pollution, noise, smoke, smell, alarms, etc, etc since 1986 when I bought this house one mile away from AES....</p> <p>Enough is Enough !!!!</p>	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.3.
533.01	Power Plant must be closed. No extensions and no excuses. Close it now...end of story.	Comment noted. Please also see Master Responses 2.1 and 2.2.
534.01	<p>As a Hermosa Beach resident, I would like to register my opposition to any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease then. There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are over 21,000 people living within 1 mile</p>	Comment noted. Please also see Master Response 2.1, 2.2, 2.3, 2.4, and 2.5. Additionally, see responses to comments 510.01 through 510.09.

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	<p>of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses. A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square-mile area.</p> <p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa. This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon. Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, HELP protect marine life, and provide needed habitat for</p>	

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	<p>migrating birds along the Pacific Flyway and for native flora and fauna.</p> <p>Three other large power plants in this area are already extending the retirement date. We don't need AES Redondo for grid reliability. As the LA Times reported, California has a growing glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs. PLEASE do the right thing and DO NOT extend the operations of this power plant.</p>	
535.01	As a resident of 669 The Village, Redondo Beach, CA 90277. I oppose the extension of the lease to the power plant AES on the current property.	Comment noted. Please also see Master Responses 2.1 and 2.2.
536.01	I am a resident of Redondo Beach and I oppose the extension of the AES plant permit when it expires this year.	Comment noted. Please also see Master Responses 2.1 and 2.2.
537.01	I hereby demand that the life of the aes Redondo power plant not be extended beyond December 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
538.01	We have finally awakened to realize how precious our 'air' is.	Comment noted. Please also see Master Response 2.5.
538.02	Don't procrastinate. Shut down this polluting	Comment noted. Please also see Master Responses

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	monster at the AES power plant.	2.1 and 2.2.
539.01	AES Redondo Beach and the new property owner are requesting a 3 year extension which comes with 8-9 figure profits.	Comment noted. Please also see Master Responses 2.1 and 2.2.
539.02	The plant is not needed to meet the excess capacity that CAISO and the CPUC have conservatively determined is necessary.	Comment noted. Please also see Sections 5.1 and 5.2 of the Staff Report and Master Response 2.2.
539.03	This action would cause further environmental damage to the thousands of Redondo and Hermosa residents living in its shadow as well as marine life in and outside the Harbor.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
539.04	Please do NOT extend past 1/1/2021.	Comment noted. Please also see Master Responses 2.1 and 2.2. Additionally, the compliance date for Redondo Beach is December 31, 2020, and is proposed to be extended to December 31, 2021 to address grid reliability.
540.01	I am in favor of retiring the Redondo Beach power plant in 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
541.01	I've lived in South Redondo Beach many years. The power plant has remained the ugly eyesore all my years here. Party affiliation means nothing as far as the plant is concerned! We all hate it!	Comment noted. Please also see Master Responses 2.1.
541.02	For 10 years the plant has been slated for closure	Comment noted. Please also see Master Responses

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	and it should be closed on time! NO EXTENSION! We've lived with it too long already! Please close the power plant! PLEASE!!!	2.1 and 2.2.
542.01	Requesting that the AES Redondo power plant NOT be extended beyond December 2020 for the following Reasons:	Comment noted. Please also see Master Responses 2.1 and 2.2. Additionally, please see responses to comments 504.01 through 504.06.
542.02	AES Redondo s a gas-fired, 1950s-technology powr generatin station, the least efficient and most poluting per kilowatt of any coastal plant still runing.	Comment noted. Please also see Master Response 2.2.
542.03	AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please also see Master Response 2.1.
542.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, butth the City of Redondo Beach had a deal with the owner of the plant to purchase helf of the land it occuppies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.4.

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542.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Comment noted. Please also see Master Responses 2.1 and 2.2.
542.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted. Please also see Master Responses 2.1 and 2.2.
543.01	At first, the plant was well-run and rarely had any issues. But, in recent years, the age of the plant is really showing. It seems like every time they fire it up, it bellows out a tremendous amount of dark smoke and soot that descends directly on the population nearby. Large misfire events (where gases have to be loudly vented for 10 minutes) are very frequent when the plant is running.	Comment noted. Please also see Master Response 2.5.
543.02	I believe it is time to close this plant. In its current form, it is an ecological disaster. The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.

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	<p>School Board, Heal the Bay, the Surfrider Foundation and the Beach Cities Health District have studied the issue and overwhelmingly oppose the extension of the AES Power Plant in Redondo Beach.</p> <p>A previous health impact study conducted by the City of Hermosa Beach found that (even at 5% production) the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>With the increase in population surrounding the AES plant in recent years, I believe that agreeing to extend the operation of this plant beyond its scheduled closure date on 12/31/2020 would be unconscionable.</p>	
543.03	<p>You are tasked with protecting our water resources. Please do not miss the opportunity to close this power plant and restore the coastal wetlands on which this power plant was built to its original intent.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.4.</p>
544.01	<p>Close and demolish power plants in: Alamitos, Redondo, Huntington and Ormond Beaches. They all need to go.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
544.02	<p>Solar technologies and battery storage will be the</p>	<p>Comment noted. Please also see Master Response</p>

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	new backup power; incentivize these and CA won't need gigantic power plants wasting desirable real estate.	2.2.
544.03	Please vote to remove these plants ASAP.	Comment noted. Please also see Master Responses 2.1 and 2.2.
545.01	Get rid of power lines!	Comment noted. Please also see Master Response 2.1.
545.02	Your property value will increase if the plant is shut down and removed	Comment noted. Please also see Master Response 2.1.
545.03	When the plant turns on we ingest all of the pollution that spews from the haystacks	Comment noted. Please also see Master Response 2.5.
545.04	When the plant retires --the entire eye sore of a plant AND all the power lines come down with it (All down 190th)--thus improving views, property values etc.	Comment noted. Please also see Master Response 2.1.
546.01	The air pollution the outdated gas fired power plant puts out can cause Asthma which also makes people more susceptible to the Covid 19 virus. Growing up in an Urban Area is dangerous enough and doesn't need an out dated power plant adding to it.	Comment noted. Please also see Master Responses 2.2 and 2.5.

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547.01	I'm writing on behalf of the residents of Redondo Beach and the rest of the south bay here in Southern California. Please close the AES power plant in Redondo Beach in 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
547.02	We don't need the power it produces.	Comment noted. Please also see Master Response 2.2.
547.03	It's wrong to continue abusing the coast with its once-through water cooling technique. It's been disheartening to watch every year as the local and state governments continue to find ways to keep this plant open, slowing moving the shut down date to the right despite the order to do so 10 years ago.	Comment noted. Please also see Master Responses 2.1 and 2.2.
547.04	It's wrong to continue to sacrifice the wetlands that were almost eliminated by this plant decades ago when no care was given to such things, something that would be unheard of in today's California.	Comment noted. Please also see Master Response 2.4.
547.05	It's wrong to keep stringing us along despite the clear desire of the local community to close this plant and move on.	Comment noted. Please also see Master Responses 2.1 and 2.2.
547.06	Please help us move onto the revitalization of our coast line, in a way that will truly benefit all	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	Californians.	
548.01	I would like to ask that the life of AES Redondo power plant NOT be extended beyond December 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
549.01	I live across the street from the AES Power Plant, with my wife and 2 small boys, and respectfully request it be closed at the end of the year as mandated by law and that NO extension be granted.	Comment noted. Please also see Master Responses 2.1 and 2.2.
549.02	<p>We've kicked the can down the road long enough and it's time for decisive leadership. The AES power plant is the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one square mile area. According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our city and the surrounding area will improve significantly when this plant is permanently closed, and the public's health will benefit.</p>	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
549.03	Additionally, consider the economic impact of land development, at what is a critical time in our	Comment noted. Please also see Master Responses

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	state's history.	2.1 and 2.2.
549.04	<p>Please! There's one obvious choice when considering what's best for the people of the Southbay and our environment.</p> <p>Close it down at the end of the year and let's move forward towards a cleaner and better tomorrow.</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
550.01	I am opposed to the extension of the AES power plant to operate for another 3 years. As a new resident of Redondo Beach (who lives a mile away from the site), I find it mind boggling that such a structure exists in one of the most valuable pieces of waterfront in the state. I fear the air and water pollution that the plant creates especially since my family and I enjoy swimming in the ocean every chance we get (and not to mention within a half mile of the plant).	Comment noted. Please also see Master Responses 2.1 and 2.2.
550.02	Please help us stop this plant from operating for another three years.	Comment noted. Please also see Master Responses 2.1 and 2.2.
551.01	Please close the Redondo Beach AES Power Plant as scheduled the end of this year on time. Absolutely no extensions!! It's been scheduled for 10 years; it's time to close it once and for all.	Comment noted. Please also see Master Responses 2.1 and 2.2.
552.01	Hi I'm reed thompson I'm been living next to the	Comment noted. Please also see Master Responses

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	Redondo Beach plant for over a year now and i would like to see it deactivated on time in 2020. It is t used much and the plant owners just want to use it to continue to pollute the planet and make money. It would also allow land to be opened up in the area and I want to buy land here to build a house. With this plant here I can't realize this dream.	2.1, 2.2, 2.3, and 2.5.
553.01	Opposed to any extension!! Please enough us enough! This needs to be done with, our lives matter!! Native Redondo beach home owner and passionate about our beach community!	Comment noted. Please also see Master Responses 2.1 and 2.2.
554.01	I stand against an extension. As the beach cities are part of California, there should be no reasonable excuse to grant an extension to the power company in this matter. California was suppose to be transitioning to clean energy for sustainability of the environment. There are multiple clean energy systems available as of 2020 which do not need a water cooling system. Resolution NO. 2010-0020 states that best technology be used for cooling systems, but the power plant in question is producing an overabundance of energy that is not needed. Allowing the polluting AES power plant, that is not needed, to remain open by granting an extension shows that the beach cities councils are	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5. Additionally, the compliance date for Redondo Beach is December 31, 2020, and is proposed to be extended to December 31, 2021 to address grid reliability.

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	<p>incompetent and furthering environmental harm. The operation of the power plant was set by the council to cease operation by 1/1/2021, and this is what should be done. An extension would only harm the residents and sea life through environmental damage.</p>	
555.01	<p>This plant has to go— it is antiquated and dangerous-</p> <p>Just think is the Santa Monica Bay in the 1970's.... if hard decisions were not made then ...what do you think the Nay would look like now???????...A TOXIC MESS.</p> <p>Please— DO NOT EXTEND THE SHUTDOWN.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
556.01	<p>I am writing you request that you retire the AES power plant in Redondo Beach effective the end of this year. Please do not extend that date as we have had to live with this monstrosity for over 15 years since we moved to Redondo Beach. The pollutants released and the noise are something no resident needs.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>
557.01	<p>Please do NOT extend the life of the AES Redondo power plant beyond December 2020.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
557.02	<p>The cities of Redondo Beach, Hermosa Beach, their school districts, and the Beach Cities Health</p>	<p>Comment noted. Please also see Master Responses</p>

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	District are all unanimously opposed to any extension of operations of this outdated, gas-fired AES generator, due to the noise and pollution from the plant, the harm to marine life, and the impact on property values.	2.1, 2.2, 2.3, and 2.5.
557.03	<p>The AES power plant is scheduled to completely cease operations 12/31/2020. Air pollution and carbon emissions have been a concern adversely affecting residents. We have been residents of Redondo Beach for over 27 years, and there are over 21,000 residents living within a mile of the AES power plant. A prior health impact study conducted by Hermosa Beach found that even at 5% production, the AES power plant was the largest source of fine particulate pollution in the area. This is especially dangerous during this time of the Corona Virus and the exacerbation of the disease caused by lung irritation.</p> <p>The air quality in our cities will improve significantly when this plant is permanently closed, and the public’s health will benefit — critically important now due to the implications of the Corona Virus pandemic.</p>	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
557.04	Also, removal of the power plant will allow some restoration of coastal wetlands, which are extremely effective at capturing and storing	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.4.

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	carbon.	
557.05	The AES power plant is not needed for grid reliability. Existing power plants produce more than enough. Los Angeles Times reported that California’s power plants will be producing 21% more electricity than California even needs.	Comment noted. Please also see Master Response 2.2.
558.01	I urge you to reject an extension of the operation of the AES power plant in Redondo Beach. I live about a mile and a half from this AES Redodoo powerplant. We have been looking forward to the closing of the power plant. It should close as scheduled.	Comment noted. Please also see Master Responses 2.1 and 2.2.
559.01	I am opposed to any extension of the AES Redondo Beach power plant operations. My family has lived in Redondo Beach for over three decades. For too many years this AES plant (formerly a SCE plant) has been an obsolete, seismically vulnerable operation that has dumped pollution into the South Bay. Don’t set any negative precedents, please.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5. The seismic vulnerability of the Redondo Beach facility is outside the scope of this amendment.
560.01	I am not the most eloquent letter writer not am I well educated on all the impacts to the environment through the water or air. I know I’ve lived in Redondo Beach for 30 years and that removal of the AES power plant for more than	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	<p>aesthetic reasons is due. These are the issues I find to be solid and truthful and worthy of final resolution by not extending the current deadline.</p>	
560.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
560.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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	<p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
560.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	<p>Comment noted. Please also see Master Response 2.5.</p>
560.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.4.</p>

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	space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
560.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Response 2.4.
560.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Comment noted. Please also see Master Responses 2.3 and 2.4.
560.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
560.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Comment noted. Please also see Master Response 2.2.
560.10	I humbly request that no extensions or changes be made to this present agreement to end the gas	Comment noted. Please also see Master Responses

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	powered energy generation electricity at this plant. It is dirty and inefficient and it's obsolete.	2.1 and 2.2.
561.01	The California State Water Resources Control Board is voting in July on whether to extend the retirement of the AES power plant in Redondo Beach. The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease then.	Comment noted. Please also see Master Responses 2.1 and 2.2.
562.01	As a Redondo Beach resident, I would like to register my opposition to any extension of operations of the outdated, gas-fired generator at the AES power plant. The plant is scheduled to cease operations 12/31/2020, and we ask that you ensure that operations cease then.	Comment noted. Please also see Master Responses 2.1 and 2.2.
562.02	There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.	Comment noted. Please also see Master Responses 2.5.
562.03	There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.	Comment noted. Please also see Master Response 2.1.
562.04	A previous health impact study conducted by the	Comment noted. Please also see Master Response

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	City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square-mile area.	2.5
562.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	Comment noted. Please also see Master Responses 2.1 and 2.4.
562.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Comment noted. Please also see Master Response 2.4.
562.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Comment noted. Please also see Master Responses 2.3 and 2.4.
562.08	Three other large power plants in this area are	Comment noted. Please also see Master Responses

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Letter and Comment Number	Comment	Response
	already extending the retirement date. We don't need AES Redondo for grid reliability.	2.1 and 2.2.
562.09	As the LA Times reported, California has a growing glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
563.01	Please do not extend the AES Redondo Beach power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
563.02	The power plant is a noisy eyesore that pollutes our ocean and our air, and has blighted our waterfront for decades. It kills everything that enters the 14-foot diameter intake structures that draw in seawater to cool their operations. It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise that scares and awakens everyone nearby at all hours of the night. This behemoth must go.	Comment noted. Please also see Master Responses 2.1, 2.3, and 2.5.
563.03	There are other power plants in Southern CA that are better suited to provide power. The AES power plant is no longer efficient and is detrimental to the environment. Please close it	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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Letter and Comment Number	Comment	Response
	down as scheduled.	
564.01	<p>This is just a brief email to say that I agree with sticking the agreed closure date of the AES plant in Redondo Beach at the end of this year should be honored.</p> <p>AES has had plenty of time to sort their affairs and allowing them to drag their heels any further should NOT be an option.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
565.01	As a resident and homeowner in proximity to the powerplant, I oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
565.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.

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565.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, 2.3 and 2.5.</p>
565.04	<p>A previous health impact study conducted by the City of Hermosa Beach found even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer</p>	<p>Comment noted. Please also see Master Response 2.5.</p>

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	<p>in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	
565.05	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, and 2.4.</p>
565.06	<p>This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.</p>	<p>Please see Master Response 2.4.</p>
565.07	<p>Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.</p>	<p>Please see Master Responses 2.3 and 2.4.</p>
565.08	<p>They are already, unexpectedly extending the</p>	<p>Comment noted. Please also see Master Responses</p>

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	retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	2.1 and 2.2.
565.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
566.01	Dear distinguished members of the Water Board. I'm Rob Gaddis, a Redondo Beach resident. I write this to implore you not to extend the operations of the AES Redondo power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
566.02	The Redondo Beach community is united on the subject of ceasing operations at AES Redondo on schedule at the end of 2020, despite what AES, the real-estate developer and a handful of paid shills try to convince you.	Comment noted. Please also see Master Responses 2.1 and 2.2.
566.03	As a community, for the past two years we had what we thought was a deal with the real-estate developer who acquired the land from AES. The deal was for the City to buy half of the property to restore wetlands, as directed by the Coastal Commission, and to create open public space in our park-poor city. To be clear, and this is very important, the	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.4.

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	<p>AES power plant land is currently zoned 100% as park and open space.</p> <p>When this notion of an extension came up, the developer reneged on our deal, and is seeking a big payoff in collusion with AES on such an extension, at the expense of the health of our children and other residents.</p> <p>They are now describing a deal to you, involving giving the land to Redondo, which is neither the deal they actually offered nor free of claw backs, contingencies and impractical terms, such as them retaining ownership of the park and open space. This has been rejected completely by the residents and our elected officials.</p>	
566.04	<p>Plus, they now preface all discussions with the demand that the city and residents stand down from opposing the extension before the Water Board.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
566.05	<p>They see offering remediation of the land. We all know that the new property owner and AES are responsible for the remediation under any circumstance. Any promise by AES to contribute to remediation just financially benefits the developer, not the City.</p>	<p>Comment noted. Please also see Master Response 2.1.</p>
566.06	<p>I want you to know that there is no agreement</p>	<p>Comment noted. Please also see Master Response</p>

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	between the city and the developer.	2.1.
566.07	<p>AES and the developer now broadcast threats of</p> <ul style="list-style-type: none"> a. blighting the land b. blocking the power lines from being taken down c. leaving the current plant as a rusting hulk until they get the entitlements they seek, and d. not remediating the wetlands, as directed by the Coastal Commission. 	Comment noted. Please also see Master Responses 2.1 and 2.4.
566.08	This is blackmail, pure and simple. This is not working with the community; it is working against the community, while they are poisoning the community.	Comment noted. Please also see Master Response 2.1.
567.01	I have lived 28 years in Southern California, and 25 of those within just a couple of miles of the Redondo Beach power plant. I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	the OTC Policy a decade ago.	
567.02	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Comment noted. Please also see Master Responses 2.2 and 2.3.
567.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	Comment noted. Please also see Master Responses 2.1 and 2.4.
567.04	The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt	Comment noted. Please also see Master Responses 2.1, 2.3, and 2.4.

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	production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds. The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	
567.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Comment noted. Please also see Master Response 2.2.
567.06	Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.	Comment noted. Please also see Master Responses 2.1 and 2.2.
567.07	Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	2021 have become even more unlikely to occur.	
567.08	<p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p> <p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
568.01	I live in King Harbor. Please close the AES plant as agreed this year.	Comment noted. Please also see Master Responses 2.1 and 2.2.
569.01	As long time residents of Redondo Beach we oppose any extension to the AES power plant operation. Help us to finally put a stop to the noise and pollution. Redondo Beach has suffered enough with this antiquated system.	Comment noted. Please also see Master Responses 2.1 and 2.2.
570.01	I am writing to oppose the extension of the AES power plant in Redondo Beach. The location of this power plant does not make sense with the number of residential properties that are in close proximity today. My family lives 2 blocks from the power plant. We have a 3 year old and a 2 month old baby. I want my kids to grow up breathing	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.

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	clean air, not the soot, nitrous oxides, sulfur oxides, and fine particulate that spew from this plant. Please honor the scheduled retirement of this plant which has been in place for a decade.	
571.01	Please let plant is shut down on schedule, do not extend for other period.	Comment noted. Please also see Master Responses 2.1 and 2.2.
572.01	I was very disappointed to learn that your board is considering extending the life of the AES power plant in the densely populated city of Redondo Beach. Nearly 10 years ago it was decided that this polluting and unnecessary AES power plant should be closed no later than December 2020 for many reasons, not the least of which were the damage it was doing to our ocean sea life. A decision that bows to the desires of a company to continue to earn a great deal of money running this unnecessary power plant (which runs less than 5% of the time) is unconscionable.	Comment noted. Please also see Master Responses 2.1, 2.2 and 2.3.
572.02	While denial is always comfortable, political courage and action are our best tools for positive change. The hypocrisy of attempting to encourage healthy eating habits and develop young minds while refusing to take a stand against extending the life of this power plant that significantly adversely effects the health and brain development of thousands of our students at a	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.

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	<p>number of our schools in the path of the pollution cloud under the smoke stack of the AES power plant is striking.</p> <p>The AES power plant smoke stacks are visible from Redondo Union High School where most of our children attend. Many studies on children have all found a negative impact of air pollution on cognition (thinking ability). These findings are most dramatically associated with fine matter particulate pollution, which are a primary emission from the AES power plant even with its limited usage. Boston University School of Public Health published a report in 2008 that followed children from birth through 10 years of age. They found that children exposed to greater levels of a certain type of particulate scored significantly worse on tests of memory, as well as both verbal and nonverbal intelligence. More recently, a study published in 2016 by researchers from Columbia University followed children from birth to age 7 and found that children exposed to higher levels of urban air pollutants known as polycyclic aromatic hydrocarbons while in utero were more likely to experience attention problems and symptoms of anxiety and depression. Similarly a study from the University of Michigan found that children exposed to the highest levels of pollution had the lowest attendance rates and a greater percentage of</p>	

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	<p>children who failed to meet state testing standards. A series of studies from researchers at UC Davis have concluded that the emissions of fine matter pollution are directly associated with increase rates of autism spectrum disorders.</p> <p>Studies in Mexico City, a notoriously polluted place, have found that the brains of dogs in the city had significantly more signs of brain deterioration (amyloid plaques and neurofibrillary tangles both associated with Alzheimer’s disease in humans) compared to dogs outside of the city. MRI scans identified brain changes in children living in Mexico City, as well as lower scores on tests of memory, cognition, and intelligence.</p>	
572.03	<p>The decision to continue to allow this polluting and dangerous power plant to operate for even one day longer is a slap in the face to our community. It is well understood that the impact of OCVID 19 is made much more deadly by risk factors including asthma and other respiratory issues which are clearly exacerbated by this power plants continued presence so close to so many people. We all deserve better. I strongly encourage you to demonstrate the fortitude required to allow the AES power plant to be retired as planned.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.</p>
572.04	<p>The electrical power that this plant provides is not</p>	<p>Comment noted. Please also see Master Responses</p>

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	required for grid reliability and that location is the worst possible location for such an emitter of poison.	2.2 and 2.5.
573.01	<p>The majority of the voters have clearly already spoken in favor of retiring the AES plant in Redondo Beach.</p> <p>Please do not allow AES to be granted a 3 year extension on their closure date this goes against the will of the people.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
574.01	<p>As the recent sale of this property was announced, I can not think of anything more damaging to our local air quality then extending the plants operation.</p> <p>The time has come to close this old facility that has reached the end of its life span.</p> <p>I vehamitlgy oppose any extension to the AES plant located in Redondo Beach.</p> <p>The choice is easy, you just have to choose to lead and make the right decision for the people of Hermosa, Redondo and beyond...</p>	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.
575.01	I'm a resident of Redondo, Manhattan and Hermosa Beach for over 30 years and I'm really fed up with the greed of this corporate struggle.	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	We have rebuffed them through a grass roots effort many times and now they are trying an end run with a great deal of money.	
575.02	Please please do not continue this Power Plant usage in Redondo Beach. Not only is it obnoxious environmentally from many points, it is totally unnecessary having long ago passed its' value as a supplier.	Comment noted. Please also see Master Responses 2.1 and 2.2.
575.03	Big money is supporting the efforts of these polluters only for monetary reasons. The property deserves to be used by the people of California not just a financial battleground generated by a corporate entities foreign to California.	Comment noted. Please also see Master Response 2.1.
575.04	Reject the appeal!	Comment noted. Please also see Master Responses 2.1 and 2.2.
576.01	The AES Plant, scheduled to cease operations at the end of this year, blocks views, damages harbor & recreational uses, pollutes the ocean, and sets back most improvements in King Harbor at a time when the area, and the whole country, is trying to recover. Meanwhile, the CPUC has not demonstrated that this extension of the most polluting and least efficient plant, is necessary.	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.3.
576.02	Lastly, AES has recruited their usual cast of paid shills to try and portray us as a divided	Comment noted. Please also see Master Responses

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	community...we're not. Only those who stand to gain financially favor this extension.	2.1 and 2.2.
576.03	So please do the right thing and close the Redondo Beach plant this December.	Comment noted. Please also see Master Responses 2.1 and 2.2.
577.01	We are writing about the damage to our air quality affecting Los Angeles beaches with the active AES plant in Redondo Beach. This toxicity has no place nor need in a high density neighborhood bordering our natural resource of the ocean. Tens of thousands people reside here and even more visit the beach. This is a travesty on any day, now add our current shelter in place when the earth is actually healing. Shame on AES and their supporters. Do not allow them to continue to pump hazardous chemicals into our air, that actual human beings breathe! This air pollution travels through to you too, into the greater Los Angeles area. Keep us healthy and safe!	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
578.01	I am writing to demand that the life of the AES Redondo power plant NOT be extended beyond the originally agreed-upon date of December 2020. I am appalled at the thought that this monstrosity, which could severely endanger the health of the Redondo Beach residents, would receive an extension. This is NOT what the	Comment noted. Please also see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	community here wants to see happen.	
578.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
578.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.	
578.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Comment noted. Please also see Master Response 2.5.
578.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	
578.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Response 2.4.
578.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
578.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
578.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
579.01	As a Hermosa resident, I am writing to insist that the plant cease operations as planned at the end of 2020. If you are planning to do so already, then	Comment noted. Please also see Master Responses 2.1 and 2.2.

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 Response to Comments on the Amendment to the
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	<p>thank you very much.</p> <p>If there's any hesitation, or purpose to keep the plant open, please see below. CA is overproducing our energy requirements by over 20%. This aging plant adds unnecessary health risk to over 200k people living within a mile.</p>	
579.02	<p>The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
579.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 210,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa's southern border. AES is across the</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	<p>street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	
579.04	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Comment noted. Please also see Master Response 2.5.
579.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile,	Comment noted. Please also see Master Responses

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Letter and Comment Number	Comment	Response
	Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.	2.1 and 2.2.
579.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Response 2.4.
579.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4
579.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Comment noted. Please also see Master Responses 2.1 and 2.2.
579.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than	Comment noted. Please also see Master Response 2.2.

Table 8 – Comment Letters 500 to 599
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Letter and Comment Number	Comment	Response
	California needs.	
580.01	The AES plant needs to be torn down and replaced with a park. Innovation has led to ample power supplies. More importantly, this plant is truly disgusting to look at. Old folks living in the area of South Bay have gotten too complacent because of their property value bubble and don't realize how quickly this can change as certain areas are left behind as the rest of the country evolves with beautiful parks, stores, restaurants, and overall development. This area of Redondo and certainly the pier is embarrassing to bring visitors to.	Comment noted. Please also see Master Response 2.1.
581.01	As a resident and homeowner in the South Bay, I oppose to any extension of the AES Redondo Beach power plant. The powerplant continues to be a public health issue and general nuisance. Please retire AES Redondo Beach power plant on December 31, 2020.	Comment noted. Please also see Master Responses 2.1 and 2.2.
582.01	I am a lifelong resident of Southern California. The health and beauty of the marine environment in Santa Monica Bay is of special concern to me. I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power	Comment noted. Please also see Master Responses 2.1, 2.2, and 2.3.

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	generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	
582.02	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Comment noted. Please also see Master Response 2.2 and 2.3.
582.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	Comment noted. Please also see Master Responses 2.1 and 2.4.
582.04	The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the	Comment noted. Please also see Master Responses

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	<p>historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p> <p>The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”</p>	2.1, 2.2, 2.3, and 2.4.
582.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Comment noted. Please also see Master Responses 2.1 and 2.2.
582.06	Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.	Comment noted. Please also see Master Response 2.2.
582.07	Under these circumstances, and given the fact that there only will be a gradual opening under the	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	<p>best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p> <p>Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.</p>	
582.08	<p>Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
582.09	<p>Please help see that the power plant is removed. It is loud and disrupts our sleep. Not to mention, it is such an eye sore and it has been promised to the residents that it will be removed and wetlands will be restored. This is will be better for everyone's health and safety.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.4.</p>
583.01	<p>Hi there, my name is Sahab Ilkhchooyi and I'm a resident of Redondo Beach. I see there's a vote to close down the AES plant by the end of this year (2020). My vote goes towards shutting it down by the end of this year. Thank you.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
584.01	<p>I am in full support for the retirement of AES</p>	<p>Comment noted. Please also see Master Responses</p>

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	located on the Hermosa Beach/Redondo Beach boarder.	2.1 and 2.2.
584.02	There are sounds that are ear piercing coming from the plant at random times, my assumption gas is being expelled. It is very disturbing especially when trying to sleep.	Comment noted. Please also see Master Response 2.1.
584.03	The plant has inadvertently created a homeless community around it due to the area not being developed and near the beach. We have constant theft, unwanted visitors knocking on doors asking for money, and a variety of scary stories from residents regarding attempted sexual assaults. I deeply believe that the plant inadvertently plays a part in the level of crime in this area.	Comment noted. Please also see Master Response 2.1.
584.04	The economic benefit of removing the plant and returning the area to the public/companies would be massive. We are all going to need as much positive economic movement as possible to recover from CoVid and this will directly help our community financially.	Comment noted. Please also see Master Responses 2.1 and 2.2.
585.01	I am writing on behalf of my self, family and friends that reside in the Redondo Beach. We would like to respectfully request for your committee to make sure the retirement of the AES Redondo Beach power plant takes place at the	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	end of this year and it closes for good. We strongly oppose the extension of any permit that will allow this site to continue putting in danger the well-being of the residents in our communities.	
585.02	It's a very dated and an unnecessary dangerous pollutant factory to our air and waters. I have witnessed and feel horrified of the effects of the black smoke that It spews tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates.	Comment noted. Please also see Master Responses 2.3 and 2.5.
585.03	When you make important decisions like this, please take in consideration children that have asma, elderly and all of us. What would you do if this was your neighborhood.	Comment noted. Please also see Master Response 2.1.
586.01	I am an 18-year resident of Redondo Beach. I am writing to ask that this Board not allow the extension of the operation of the AES Power Plant in Redondo Beach past the approved expiration date of December of this year.	Comment noted. Please also see Master Responses 2.1 and 2.2.
586.02	The only reason that AES and the new owners of that piece of coastal property want to extend the operating permit of the power plant is because they want money. AES entered into a sales agreement with a purchaser who appears to not	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	<p>have the money to complete the purchase and assume full ownership. The purchaser, likewise apparently entered into an agreement without first securing the financing necessary to assume the burdens which ownership entails. Both parties were fully cognizant of the terms of the agreement to which they agreed.</p> <p>Giving these two parties permission to change the terms of the power plant operating agreement after the sale relieves them of living up to the terms of the financial arrangement into which the two parties freely entered. I see no reason why it is this Board's responsibility to make such accommodation, which only favors the two parties of a voluntary, executed private real estate deal.</p>	
586.03	<p>Additionally, and more to the point of an agency tasked with representing the public's interests, extending the operation of the power plant for three more years means that the remediation of sensitive wetlands, and redevelopment of the property into its only other legally-permitted use is also put off three more years. This is an unfair burden on the public who live in or visit Redondo Beach and the surrounding communities. We have been waiting a long time for this purchase to go through so that we may plan to create a public park. Our community has a deficit of public park</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2., and 2.4</p>

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	space, and it is in the public's best interest to allow this sale to go through under the terms to which the parties agreed. Those terms include remediation of the property's sensitive wetlands, which operation of the power plant has caused, and redevelopment of the land into a public park.	
586.04	Demand for power has not changed. The environmental and human health damage caused by operation of the power plant in a densely populated region has not changed. The need for remediation and redevelopment of one of the most valuable coastal parcels in the state of California has not changed. The mission of this agency has not changed. Nothing has changed except that two parties to a mutual real estate agreement are feeling short on cash, and are trying to place the burden for relief on the public. The residents of Redondo Beach and the surrounding region want the deal which affects our quality of life and the future of our community to go forward as is required by law. That has not, and will not change.	Comment noted. Please also see Master Responses 2.1 and 2.2.
587.01	As a resident of Redondo Beach who lives in proximity to the AES power plant in my city, I oppose the proposed extension of the plant's operation until 12/2021. Given that the plant functions only for back up and that even in that regard it operates so infrequently and at such a	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	low level, I would suggest that the needs could be met by another plant.	
587.02	<p>It seems that the risk of the airborne particulate matter to Redondo Beach residents and the risk of the Once-Through-Cooling to sea life, the risks far outweigh the justification of another year of plant operation.</p> <p>Let's take a step in the right direction, of environmental friendliness, and close the plant. I would love for my child to never again tell me in the morning, 'Mom, you wouldn't believe what the power plant was spewing out in the air last night. It was so loud it woke me up.'</p>	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
588.01	Please close the Redondo Beach AES power plant at its scheduled retirement date of 12/31/2020. This plant must go, and we have been waiting years for it to do so. It is a behemoth in our community and its cons far outweigh any pros. Please do the right thing for public health, quality of life, and the environment.	Comment noted. Please also see Master Responses 2.1 and 2.2.
589.01	To whom it may concern. I am writing to urge you to keep in place the 12/31/2020 shutdown date for the AES power plant in Redondo Beach. This plant is inefficient, noisy, and very harmful to marine life. In addition to that, the pollution it emits	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	<p>is unhealthy for the thousands of residents living nearby.</p> <p>Please do the right thing and close this plant as scheduled.</p>	
590.01	Please close the AES Power Plant in 2020	Comment noted. Please also see Master Responses 2.1 and 2.2.
591.01	I oppose any extension for operation of the AES Redondo Beach power plant, as currently proposed.	Comment noted. Please also see Master Responses 2.1 and 2.2.
591.02	The Redondo Beach power plant's output power is not required. Even without operating the Redondo Beach AES power plant, data analysis shows that power from the remaining OTC power plants exceeds the required 2,750MW for CY2021 by 133MW.	Comment noted. Please also see Master Responses 2.1 and 2.2.
591.03	Also, the power plant is a significant polluter, in terms of water, air, noise, and visual aesthetics. Nobody wants this dirty thing around here anymore.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
591.04	I join the many others also in opposition, which include state, county, and city elected officials, and many other groups and organizations.	Comment noted. Please also see Master Responses 2.1 and 2.2.
592.01	I support the City of Hermosa Beach, City of	Comment noted. Please also see Master Responses

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	<p>Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District, all of whom unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant. In addition Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease by that date.</p>	2.1 and 2.2.
593.01	Our waterfront is too precious. Please close AES! Now more than ever we need green space!	Comment noted. Please also see Master Responses 2.1 and 2.2.
594.01	Please do not extend the operation of the AES site beyond this year. The community was promised to remove this eyesore and remediate the land.	Comment noted. Please also see Master Responses 2.1 and 2.2.
595.01	I am a resident of Redondo Beach and I strongly oppose the extension of the shut down date of the plant. Redondo Beach is a beautiful thriving community which has been literally ripped apart by the plant and its power lines. Keep the promise made 10 years ago. We have been waiting to have our city back.	Comment noted. Please also see Master Responses 2.1 and 2.2.
595.02	The health affects alone should be enough to justify shutting it down. There are over 21,000	Comment noted. Please also see Master Responses

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	<p>people living within 1 mile of the plant, and the particulate spewing just continues to go on and on. It is a blight on a wonderful community, and we want it gone.</p>	<p>2.1, 2.2 and 2.5.</p>
596.01	<p>As a citizen of Redondo Beach, I agree with the City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	<p>Comment noted. Please also see Master Responses 2.1 and 2.2.</p>
596.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,0000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p>	<p>Comment noted. Please also see Master Responses 2.1, 2.2, and 2.5.</p>
596.03	<p>It’s clear that air quality in our City and the</p>	<p>Comment noted. Please also see Master Responses</p>

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	surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.	2.1, 2.2, and 2.5.
596.04	Please listen to the citizens as well as cities, county and state officials!	Comment noted.
597.01	<p>As a resident family of 4 in Redondo beach with children here .</p> <p>We are all asking to not extend the use of the power plant and shut it off ASAP !!!</p>	Comment noted. Please also see Master Responses 2.1 and 2.2.
598.01	I stand in opposition to any extension of Redondo Beach's power plant along with State Senator Ben Allen, Assemblymember Al Muratsuchi, Los Angeles County Supervisor, Janice Hahn, the Redondo Beach City Council and School Board, Hermosa Beach City Council and School Board, the Beach Cities Health District, Heal the Bay and the Surfrider Foundation. They have all publicly announced opposition to any extension of the AES Redondo Beach power plant.	Comment noted. Please also see Master Responses 2.1 and 2.2.
598.02	Why? Because it is a noisy eyesore that pollutes our ocean and our air, and has blighted our waterfront for decades. It kills everything that enters the 14-foot diameter intake structures that draw in seawater to cool their operations. It spews	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	tons of soot, nitrous oxides, sulfur oxides and fine particulate emissions into our neighborhoods every time it operates. Because of its antiquated technology, when it starts up, it releases black plumes of toxic smoke and emits jet-engine-like noise that scares and awakens everyone nearby at all hours of the night. This behemoth must go.	
599.01	We are residents of Redondo Beach, and we urge you to abide by the original 2020 closure date for the AES power plant. Our concerns include environmental, health/safety, electrical grid supply, and community benefits issues.	Comment noted. Please also see Master Responses 2.1 and 2.2.
599.02	It has long been known that once-through cooling does great harm to marine life. That's the main reason the plant was scheduled for closure in the first place. Additionally, every time the plant is fired up, it belches toxic smoke into the air. This air pollution is a big concern for us, especially since COVID-19 is much more dangerous to people with lung issues. Also, the high-tension power lines coming from the plant are a source of electromagnetic radiation and run through densely populated neighborhoods.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5. Additionally, please see response to comment 003.01.
599.03	It has already been established that the power provided by the plant is not necessary for a sustained supply of electricity, and in fact, it has	Comment noted. Please also see Master Responses 2.1 and 2.2.

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	not run continuously for quite some time. When it does run, its outdated technology means it takes days to get up to speed in order to produce power.	
599.04	The plant site includes a natural salt marsh type wetland that has become polluted and needs cleanup. Additionally, the plant is an eyesore that spoils one of the most beautiful parts of the local coastline.	Comment noted. Please also see Master Responses 2.1 and 2.4.
599.05	Removal of the plant is going to happen, whether this year or three years from now. The downsides of keeping it open far outweigh any slight benefits. In fact, the only beneficiaries are the owners of the plant! All of the nearby communities want this toxic eyesore to go. Putting off the inevitable for a few more years will mean we residents have to endure more pollution and hazardous electromagnetic radiation, while gaining no benefit from the site.	Comment noted. Please also see Master Responses 2.1, 2.2, 2.3, and 2.5.
599.06	We need more beautiful open space in our community, and that's what we will get--the site is zoned for parkland. We want the marsh restored, giving needed refuge for migratory birds.	Comment noted. Please also see Master Responses 2.1 and 2.4.
599.07	Delaying the closure of the plant will only hurt us. Please approve the orderly shutdown of the AES plant at the end of 2020, as originally planned.	Comment noted. Please also see Master Responses 2.1 and 2.2.

Table 9 – Comment Letters 600 to 699
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Letter and Comment Number	Comment	Response
600.00	Get rid of Power Lines Please	Please see Master Response 2.1.
601.01	<p>After reading through everything I as an informed consumer believe that The Redondo Beach AES plant needs to close on December 20, 2020. To prolong its closure serves no environmental component. I read the mission statment I implore you as human beings to let the contract end on time. We have already seen the benefits of wildlife adjusting. We have all suffered through this Global pandemic. The exctension of this Plant would only serve the wealth of an individual. The residents of the Beach cities deserve better. Our children deserve better.</p> <p>When a descion is made with such momentum it needs to be heeded. I will not come from a fear based perspective. A descion was made by a group of nature loving good intentioned citizens. Please show respect and let the contract play itself out. Do nothing and let Plant close.</p>	Comment noted. Please see Master Reponses 2.1 and 2.2.
602.01	As a resident of Redondo Beach, I believe that the year 2020 is the appropriate time for the AES power plant to retire. Although the power plant rarely produces electricity, and does not provide power directly to Redondo Beach or the South Bay, it still pumps hundreds of tons of poisonous gas and dangerous particulate into our air every	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	year. Its ocean-water cooling system kills enormous amounts of marine life as well. Not one more year, much less three years, should this pollution impact our community.	
602.02	Despite no evidence of the need for AES Redondo to stay open for grid reliability, AES Corporation is pushing for a 3-year extension to the power plant's life. Such an extension would give AES tens of millions of dollars in profit at the expense of South Bay residents' health. The Water Board will make a decision on this proposed extension in June. The Water Board members must consider people over profits and retire the AES plant now.	Please see Master Responses 2.1 and 2.2. Furthermore, the State Water Board is scheduled to consider the Amendment on September 1, 2020.
602.03	AES has recruited a group of paid public relations people, who don't live in the South Bay, to send emails and portray our community as divided regarding extending the operations of the power plant. The truth is that the residents of Redondo Beach and the South Bay are unified in our belief that now is the time to retire the AES power plant.	Comment noted. Please see Master Response 2.1.
603.01	I am a resident of Redondo Beach and absolutely oppose extending the operation of the AES Redondo Beach power plant. Ten years ago, it was determined that the AES power plant needed to close by Dec 31, 2020 because it harms and	Please see Master Response 2.1, 2.2, 2.3, and 2.5.

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	<p>pollutes our ocean and air. AES has had 10 years notice to cease operations which has been a very generous amount of time. Now it is time to close. Extending operations is not in the communities best interest. It is a selfish money grab by the owners of AES at the expense of the Redondo Beach community.</p> <p>I respectfully ask that you do the right thing and vote NO to extend the AES operations beyond 2020.</p>	
604.01	<p>Writing this to oppose the extension of Power Plant. The date of shutdown was decided 10years ago and there was plenty of time to plan for a clean shutdown. The plant serves no necessity and should be shutdown as per the original deadline.</p>	<p>Please see Master Response 2.1 and 2.2.</p>
605.01	<p>Please GET RID OF POWER LINES.</p>	<p>Comment noted. Please see Master Response 2.1.</p>
605.02	<p>AES Redondo is the least efficient and most polluting per kilowatt of any coastal plant.</p>	<p>Please see Master Response 2.3 and 2.5.</p>
605.03	<p>AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius</p>	<p>Please see Master Response 2.1.</p>

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Letter and Comment Number	Comment	Response
	of AES Redondo (our family included), more than are living within that distance of all three of the other power plants combined.	
605.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase half of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Comment noted. Please see Master Response 2.1.
605.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.
605.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted. Please see Master Response 2.1.

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606.01	ATTENTION! As a 25 year resident of the city of Redondo beach, I implore you to Please remove this AES outdated, ineffective, inefficient, wetlands obstructing, toxic spewing, polluting eyesore of a power plant to be retired as originally scheduled on December 31, 2020. DO NOT EXTEND THIS RETIREMENT!	Please see Master Responses 2.1, 2.2, and 2.5.
607.01	I Demand that the life of AES Redondo power plant not be extended beyond December 2020.	Please see Master Response 2.1.
607.02	AES Redondo s a gas-fired, 1950s-technology powr generatin station, the least efficient and most poluting per kilowatt of any coastal plant still runing.	Comment noted. Please see Master Responses 2.3 and 2.5.
607.03	AEX Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted. Please see Master Response 2.1.
607.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, butth the City of Redondo Beach had a deal with the owner of the plant to purchase helf of	Comment noted. Please see Master Responses 2.1 and 2.2.

Table 9 – Comment Letters 600 to 699
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Letter and Comment Number	Comment	Response
	the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	
607.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.
607.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	Comment noted. Please see Master Response 2.1.
608.01	Please shutdown this horrible building. It's not only horrible to look at but it's also a pollutant of our beautiful beach city. Please remove it and put a beautiful green space in its place that can be used and shared amongst our beach community.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3 and 2.5.
609.01	Please do not extend the lease of the Redondo Beach AES Power Plant. It is time to retire the plant and let the community decide the future for	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	the area. Listen to elected officials and members of the community. We want the opportunity to create a new future for our waterfront. Please do not back away from the sound decision that was made 10 years ago. It is time to retire the plant and move on.	
610.01	I am writing you in opposition to extending the operational life of the gas-fired AES power plant in Redondo Beach, CA. I am a 70 year old resident of 30 years living within 1/2 mile of the AES plant. The plant is scheduled to cease operations on December 31, 2020. Please let's stick to the plan.	Please see Master Response 2.1.
610.02	A recent Hermosa Beach study determined that even if the plant is operating at only 5% capacity it is the major source of the fine particulate matter in this area. Please put an end to the plant's operation. The power is not needed and the plant is not wanted.	Please see Master Responses 2.2 and 2.5.
611.01	I'm a Redondo Beach resident and I oppose extension of the AES power plant in our town. Thanks for your consideration.	Please see Master Response 2.1.
612.01	We strongly oppose an extension for AES Redondo Beach power plant and will support its opposition if necessary.	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
613.01	I oppose any extension for the closure of AES plant in Redondo Beach. Please retire it as planned this year.	Please see Master Response 2.1.
614.01	<p>I am opposed to any extension for operation of this plant. This power plant has never been a good neighbor to Redondo Beach residents, or to the South Bay population.</p> <p>It is not needed to generate electricity for the surrounding communities. It is a polluter, an environmental hazard. It is an eyesore that the community is tired of seeing every day. There is no legitimate reason for this outdated power plant to continue operating, other than to line the pockets of the recent purchasers, which consist of a group of limited liability companies and non-South Bay residents.</p>	Comment noted. Please see Master Response 2.1, 2.2, 2.3, and 2.5.
614.02	I am concerned that the power will continue to pollute the land it is on. Remediation of the soil will take years to complete, and it is not anticipated the remediation will commence until these new buyers squeeze every penny out of the power plant they can before they jump ship and dump this power plant on someone else.	Comment noted. Please see Master Response 2.1 and 2.5.
614.03	The terms of the recent purchase have been kept secret, and this is never a good sign of new	Comment noted. Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	owners doing what is right for the community.	
614.04	The power plant site is zone for parks, and the community is interested in having a park in this very crucial shoreline area. The California Coastal Commission has also expressed concern that the original wetlands be allowed to emerge from the tons of concrete which were poured over portions of the site. This power plant is destroying sea life and wildlife the more it continues to operate.	Please see Master Responses 2.1 and 2.3.
614.05	There is no legitimate reason for this power plant to be granted any extension for operation beyond December, 2020. Please do what is right for the community and shut this plant down in December, 2020.	Please see Master Response 2.2.
614.06	This was a calculated business decision by the new owners, knowing full well that Redondo Beach, Hermosa Beach, Manhattan Beach, El Segundo, Palos Verdes Estates and Torrance all oppose any extension of operations for the AES power plant. Please do not gamble with the health of South Bay residents.	Comment noted. Please see Master Response 2.1.
615.01	I would like to send in my note to ask you not to extend the AES Power Plant operating license.	Comment noted. Please see Master Response 2.1 and 2.2.
615.02	The City of Hermosa Beach, City of Redondo	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	<p>Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
615.03	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm</p>	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.

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	to marine life, and the impact on property values.	
615.04	<p>A previous health impact study conducted by the City of Hermosa Beach found-even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Responses 2.1 and 2.5.
615.05	A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense	Comment noted. Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	of the residents of Redondo and Hermosa.	
615.06	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
615.07	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
615.08	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
615.09	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
616.01	Please do not extend the AES Redondo power plant beyond December 2020. It is not necessary to sustain the area's power and needs to be shutdown. Thank you for your consideration.	Please see Master Response 2.2.

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617.01	I oppose the extension of the AES RB power plant retirement.	Please see Master Response 2.1.
618.01	I am in opposition to it remaining open. I am for it's complete closure in December 2020, as is planned. Please don't let money play into your decision. I encourage you to listen to the mayors, city councils, and most importantly, the residents in the local area, and move forward with the shut down.	Comment noted. Please see Master Response 2.1.
619.01	Do not extend life of AES Redondo Beach power plant beyond December 2020, We have farr too much pollution in our air quality already and they do not fit the aesthetics of our community.	Please see Master Responses 2.1 and 2.5.
620.01	Please do NOT extend the contract for the AES plant that borders Redondo Beach and Hermosa Beach.	Comment noted. Please see Master Response 2.1.
620.02	The plant no longer provides needed electricity for the local or surrounding communities. Instead it gives these areas pollution both seen and unseen. Both RB and HB have fought long enough to demonstrate that the majority of our communities do NOT want or need the plant in our area.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
620.03	This is a money grab by AES and once that has given the developer reason for pause as they will	Comment noted. Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	not be hurt financially.	
621.01	I am writing in favor of a shut down of the AES plant in Redondo Beach by the end of 2020. An extension of the life of the AES Redondo power plant not beyond December 2020 cannot be justified. Thank you for your consideration. Please do not by bypass this opportunity to create a beautiful green space, which is needed now more than ever.	Please see Master Responses 2.1 and 2.2.
622.01	I urge you to retire the AES Redondo Beach power plant as scheduled on December 31, 2020.	Please see Master Response 2.1.
622.02	I urgently request that you DO NOT extend the closure, and request that you respect the wishes of the residents and the urgent needs of the environment adversely affected by the plant operations.	Please see Master Response 2.1.
623.01	I am firmly opposed to any extension of the operation of the AES Redondo Beach Power Plant.	Please see Master Response 2.1.
623.02	It has sat there long enough ruining our environment and our view. I moved to Redondo Beach in 2006, started a business here, and from the beginning I have been following the press as to when we could finally get rid of the AES Plant -	Comment noted. Please see Master Response 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	in fact I was counting the days until it was shut down and taken apart. When I heard there may be an extension I was horrified and appalled.	
623.03	Please do the right thing by the residents of Redondo Beach and the surrounding areas, and abide by the promises you have made to shut this plant down.	Please see Master Response 2.1.
624.01	I am asking for No extension.	Please see Master Response 2.1.
625.01	I am opposed to the extension of the AES power plant to operate for another 3 years.	Please see Master Response 2.1.
625.02	As the mother of a 5-year-old and resident of Redondo Beach (who lives less than a mile away from the site), I am terrified of the health risks this poses. I fear the air and water pollution that the plant creates especially since my family and I enjoy swimming in the ocean every chance we get (and not to mention within a half mile of the plant). I'm also concerned about the incredible eyesore and misuse of space in one of the most beautiful stretches of coastline.	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.
625.03	Please help us stop this plant from operating for another three years.	Please see Master Responses 2.1 and 2.2.
626.01	Please don't extend the operation of the Redondo	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	Beach power plant.	
626.02	I am a long time resident and property owner i. Hermosa Beach and live six blocks away and have suffered from their stacks starting up and the contaminants that spew into the air. Please consider what this means to the local residents in terms of their health.	Comment noted. Please see Master Responses 2.1 and 2.5.
627.01	I am urging you to close the ASE power plant in Redondo Beach.	Please see Master Responses 2.1 and 2.2.
627.02	We have been waiting a long time for this agreed upon closure, please do not give the new owners an extension. They bought this knowing the closure date and deserve no consideration in this matter.	Please see Master Response 2.1.
627.03	Please honor the closure date that our community has waited patiently and close it on time.	Please see Master Response 2.1.
628.01	Please do not let the AES Redondo Plant stay open for 3 more years.	Please see Master Responses 2.1 and 2.2.
628.02	I am requesting that the AES Power Plant be shut down on December 31, 2020, on schedule.	Please see Master Response 2.1.
628.03	The plant is extremely noisy and produces black smoke which contaminates our air.	Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
629.01	As a 25 year resident of Redondo Beach living within a mile of the AES plant, I feel it is important to voice my concern regarding this plant and the possibility that it will not be shut down by December 31, 2020.	Please see Master Response 2.1.
629.02	Ten years ago, due to the limited use of the plant, I had the opportunity to attend an event held inside and view the antiquated interior of the plant. With limited use (5%) and the continued visual and air pollution, the sooner the AES plant is closed and dismantled, the faster our community will be able to breathe easier and realize a greater use for this open space.	Please see Master Responses 2.1 and 2.5.
629.03	Please DO NOT extend the operation of the AES plant.	Please see Master Responses 2.1 and 2.2.
630.01	I am respectfully writing this email to add my voice to request the AES power plant not be extended operate past December 2020.	Please see Master Responses 2.1 and 2.2.
631.01	I do not believe the AES Redondo Beach power plant should receive a OTC policy amendment for an extension of the operating permit.	Please see Master Responses 2.1 and 2.2.
631.02	I live close to the power plant in Redondo. I have a chronic lung condition which is aggravated by the fine particulate matter from the power plant.	Comment noted. Please see Master Response 2.5.

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Letter and Comment Number	Comment	Response
632.01	I am writing to oppose the extension of the AES Redondo Beach power plant.	Please see Master Response 2.1.
632.02	<p>This dinosaur needs to be retired NOW. I am a third generation Angeleno and a long time Redondo Beach resident. This power plant is not only a nuisance due to the noise and hideous structure, it is a hazard to the health of residents, and is a huge polluter to the air and water.</p> <p>I pay a premium to live on the beach because I am an outdoor enthusiast, but this power plant exposes me to a potential cancer risk. I live in Redondo Beach because I enjoy surfing, snorkeling, kayaking, sailing, scuba diving, biking and walking. However; I am being exposed to polluted water and air every time I go outside.</p>	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.
632.03	The plant is a danger to the environment, not only is every living creature that is sucked into this monstrosity killed, it raises the water temperature in the water that is returned to the ocean. In addition to the water pollution from the carcinogens released into the ocean, it is also raising the water temperature which means less oxygen in the water which kills sea life.	Comment noted. Please see Master Response 2.3.
632.04	It is a blight from the constant noise, smoke (again a cancer risk) and an eyesore. I do not understand	Please see Master Responses 2.1 and 2.5.

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Letter and Comment Number	Comment	Response
	why residents who pay taxes and pay a fortune to live here have to have our health and well-being sacrificed to appease some greedy corporation.	
633.01	As a older resident of Redondo Beach, the AES Redondo Beach power plant has has an adverse effect on my families health with the fine particulate emissions. My family has lung issues ranging from COPD and asthma.	Comment Noted. Please see Master Responses 2.1 and 2.5.
633.02	Wiith the new environmental regulations for producing CLEAN ENERGY and the age of the existing Redondo Beach Power plant, I support the rejection of any extension of the operating permit for the power plant.	Please see Master Response 2.2.
633.03	The plant is not efficient and is unsafe from an environmental perspective.	Please see Master Responses 2.2, 2.3 and 2.5.
634.01	As a Redondo Beach resident I've been watching for decades as the powerplant on Harbor Dr spews black smoke from its towers.	Please see Master Response 2.5.
634.02	I understand that it is currently scheduled to retire on 12-31-20. The purpose of this email to support that planned date as I hope and encourage no extension to be granted.	Please see Master Response 2.1 and 2.2.
634.03	Clean air please for the Southbay. Trusting you	Please see Master Responses 2.1 and 2.5.

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	will make the right decision for our health and well being.	
635.01	As a 22 year resident of Redondo Beach, and one who loves the beach and outdoor activities, I strongly oppose any extension of operations of the AES Redondo Beach Power Plant beyond the original planned retirement date of December 31, 2020.	Please see Master Response 2.1 and 2.2.
635.02	Continued operation of this plant means continued air contaminants that over time are proven to cause lung illness. Not to mention, extremely loud noises that happen during their antiquated start-up procedures. This power plant operation is simple outdated and needs to be shut down and demolished.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
635.03	Please respect the wishes and the health and well being of the majority of residents of Redondo Beach (and our neighbors in Hermosa Beach) and follow the recommendation of your predecessors on the California State Water Resources Control board 10 years ago to retire this operation by 12/31/2020.	Please see Master Response 2.1.
636.01	I am a Redondo Beach homeowner living near the beach and the AES power plant and I'm writing to say that I FIRMLY OPPOSE the plant staying	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	open any longer!	
636.02	They should shut down THIS YEAR and allow the marine life to begin healing and go do their business elsewhere. They do NOT belong on a coastline like this.	Please see Master Responses 2.2 and 2.3.
637.01	We live across from the AES plant in Redondo Beach - please close this noisy eyesore and polluter this year. Thank you!!!!	Please see Master Responses 2.1 and 2.5.
638.01	I am writing to let you know that I am IN FAVOR of closing the Redondo Beach power plant. It was promised to be closed this year but now that looks like it may not happen.	Please see Master Response 2.1.
638.02	The power plant produces an enormous amount of pollution. Our patio furniture has to be cleaned daily from all of the airborne soot. I believe it to be a health hazard as well.	Please see Master Responses 2.1 and 2.5.
638.03	Every citizen that I speak to wants it shut down. The only entities that want it open are not from this area and profit from its continued operation.	Please see Master Response 2.1 and 2.2.
638.04	The citizens of RB were promised this and expect this. Close it down on time!	Please see Master Responses 2.1 and 2.2.
639.01	PLEASE, PLEASE, SHUT THIS PLANT DOWN IT	Please see Master Responses 2.1 and 2.2.

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Letter and Comment Number	Comment	Response
	IS NOT A MUST RUN POWER PLANT!	
639.02	IT'S POLLUTED REDONDO AND HERMOSA BEACH FOR FAR TO LONG.	Please see Master Responses 2.1, 2.3, and 2.5.
639.03	THE RETIREMENT DATE WAS AGREED ON 10 YEARS AGO.	Please see Master Response 2.1
640.01	Please do not extend the closing of the Redondo Beach SCE power plant.	Please see Master Responses 2.1 and 2.2.
641.01	I am asking for a denial to any extension for AES. We have waited so long. It's overdue.	Please see Master Responses 2.1 and 2.2.
641.02	Move forward and remove this ugly, aging structure and the power lines.	Comment noted. Please see Master Response 2.1.
642.01	Hermosa Beach is a wonderful place to live. Like its neighbor, Redondo Beach, it's a community of active, mindful, generous individuals packed together in the most densely populated area in the state of California. And I am one of them. I also live right across the street from the AES power plant scheduled to be shut down. Literally, across the street. When the decision was made to shut down the power plant, effective December 31, 2020, I was elated. Not only did it protect the ocean and marine life so damaged by the once through cooling system used to power the plant,	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.

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	but closing the plant will protect the health and well-being of my neighbors, my community, my family and me.	
642.02	The plant generates very little power. It runs at about 5% capacity and every time it is “turned on”, black plumes of, what can only be described as, toxic air are spread across our cities like a smelly, unwelcome hug from the creepy guy across the street. But worse, because this hug will actually hurt us. (According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California).	Comment noted. Please see Master Responses 2.2 and 2.5.
643.03	If the plant was needed, that would be a different story. But it isn't. If the power it generated couldn't be produced by already existing plants that would be a different story. (The LA Times reported that the state's power plants are able to produce at least 21% more electricity than what is actually needed in California).	Please see Master Response 2.2.
642.04	The plant was scheduled to be shut down because it isn't needed. It was scheduled to be shut down because the people who live here deserve to have clean air and a healthy atmosphere in which to live. None of that has	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.

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Letter and Comment Number	Comment	Response
	changed.	
642.05	I implore you NOT to extend the life of this plant. Instead, please help extend my life and the lives of my neighbors. This may sound dramatic but it's true and this matters. Your decision will impact tens of thousands of lives for years to come. Keeping the plant open will benefit no one. I am in good company; the cities of Hermosa Beach and Redondo Beach, their school boards and the Beach Cities Health District all unanimously oppose any extension of operation to the AES plant.	Comment noted. Please see Master Responses 2.1.
642.06	Thank you in advance for your attention to this very important matter. We do not need the AES plant for grid reliability. Please allow the plant to close as scheduled.	Comment noted. Please see Master Response 2.2.
642.07	We need a clean ocean, healthy marine life and a safe environment for us to live.	Comment noted. Please see Master Response 2.3 and 2.5.
643.01	It is scheduled to be closed on December 31, 2020 and there is not a single benefit to anyone living in the South Bay to extend it!	Please see Master Responses 2.1 and 2.2.
643.02	Please uphold the agreement.	Please see Master Response 2.1.
644.01	I am a lifelong resident of Southern California. The	Comment noted. Please see Master Responses 2.1

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	<p>health and beauty of the marine environment in Santa Monica Bay are of special concern to me. I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6, and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p>	<p>and 2.2.</p>
644.02	<p>Redondo Beach’s Units 5 and 6 are the oldest, and least energy-efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.</p>	<p>Please see Master Response 2.3.</p>
644.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy, to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas</p>	<p>Please see Master Responses 2.1 and 2.4.</p>

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	<p>surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p> <p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p>	
644.04	The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	Please see Master Response 2.4.
644.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
644.06	Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to	Please see Master Response 2.2

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	the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%. Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.	
644.07	Indeed, the AES proposal to extend the life of the obsolete Redondo Beach plant for another three years borders on the outrageous.	Please see Master Response 2.1 and 2.2.
644.08	Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6, and 8 are richly reserving of retirement to allow the park and restoration plans to proceed apace.	Please see Master Response 2.1.
645.01	Hello, I am requesting the life of AES Redondo power plant to NOT be extended beyond December 2020.	Please see Master Response 2.1 and 2.2.
645.02	AES Redondo a gas-fired, 1950s-technology power generation station, the least efficient and most polluting per kilowatt of any coastal plant still	Please see Master Response 2.3 and 2.5.

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Letter and Comment Number	Comment	Response
	running.	
645.03	AES Redondo is located in the most densely-populated area of the California coast, with Hermosa Beach bordering it to the north, and four side of the plant bordered with residential homes. There are 21,000 people living within a mile radius of AES Redondo, more than are living within that distance of all tree of the other power plants combined.	Comment noted.
645.04	There is little opposition to extending the lives of the other three plants subject to the CPUC's request, both the City of Redondo Beach had a deal with the owner of the plant to purchase of the land it occupies, for conversion to public open space and restored wetlands (as directed by the California Coastal Commission).	Please see Master Response 2.1 and 2.4.
645.05	Importantly, the CPUC has not demonstrated that extension of AES Redondo's operating life is necessary to maintaining power-grid reliability; therefore we advocate that is operating live not be extended.	Please see Master Response 2.2.
645.06	The Redondo Beach Mayor and City Council, the Hermosa Beach City Council, the Redondo Beach School Board, Beach Cities Health District, Los Angeles County Supervisor Janice Hahn, State	Comment noted. Please see Master Response 2.1.

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	Representative Al Muratsuchi and State Senator Ben Allen and many other community organizations and leaders are unanimous in opposing extension of AES Redondo's operating life.	
646.01	Water Board: my name is Vicky Griffin and I own 660 The Village #108. Please do not extend the closing date of the power plant beyond 12/2020. We do not need it and do not want it.	Please see Master Responses 2.1. and 2.2.
646.02	I'd much rather have 15 acres of green!	Please see Master Response 2.1.
647.01	Hello - We are residents and owners of 232 S. Irena in Redondo and we oppose the extension of the AES Redondo power plant beyond December 2020.	Please see Master Response 2.1.
648.01	Please do not extend the use of the Redondo Beach power Plant beyond Dec 2020.	Please see Master Responses 2.1 and 2.2.
648.02	It has been shown that the power plant capacity is not needed. It is an old and inefficient power plant.	Please see Master Response 2.2.
648.03	The plant creates a lot of pollution in our community that affects families and children.	Please see Master Responses 2.3 and 2.5.
648.04	As a long time resident and business owner I ask you to shut down the plant by the end of the year.	Please see Master Responses 2.1 and 2.2.

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649.01	I am the owner of a beach condo in Redondo Beach. The Redondo Beach power plant is scheduled to cease operations on 12/31/2020. Please DO NOT extend the scheduled shutdown beyond 12/31/2020.	Comment noted. Please see Master Responses 2.1 and 2.2.
649.02	The plant is unneeded, generates significant pollution on our neighborhood, and takes up space that could be used for better purposes.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
650.01	Please retire the AES power plant in 2020!	Please see Master Responses 2.1 and 2.2.
650.02	The AES power plant is a blight on our waterfront. it is not an appropriate use of an area that is so populated.	Please see Master Response 2.1.
650.03	And as far as power needs go, the LA Times found that the state’s power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
650.04	The benefits to retire the power plant far exceed any benefit.	Comment noted. Please see Master Responses 2.1 and 2.2.
651.01	I am a resident of Redondo Beach, living within a half mile of the AES Redondo power plant. I have been living with the smoke and noise of the plant as well as the ashen particles that rain down on my house and garden.	Please see Master Responses 2.1 and 2.5.

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651.02	It stretches the imagination for me to consider that anyone would want it to stay open past its scheduled retirement at the end of this year.	Comment noted. Please see Master Responses 2.1 and 2.2.
651.03	Please do not extend its life beyond the end of this year.	Please see Master Responses 2.1 and 2.2.
651.04	The generating capacity is not needed, and it makes no sense for us to pay tens of millions of dollars for unneeded capacity at the expense of our health and our environment.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
651.05	Please leave AES Redondo out of any extension plans.	Comment noted. Please see Master Responses 2.1 and 2.2.
652.01	Please do not extend the operation of the Redondo Beach AES power plant.	Comment noted. Please see Master Responses 2.1 and 2.2.
652.02	It is located in one of the most densely populated areas of Southern California. I understand the rationale for back up power plants, but please use population density in proximity of the power plant as the number one priority to decide which power plants get extended and which ones do not.	Comment noted. Please see Master Response 2.1.
653.01	Please do not extend the AES Power plant lease/ agreement past 2020!	Please see Master Response 2.2.
653.02	As a 35 year resident who lives just a few blocks away, I'm tired of the pollution, noise, and ugliness	Please see Master Responses 2.1, 2.3, and 2.5.

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	in front of my home.	
654.01	<p>I'd like to lodge a comment about the proposed extension of operations at the AES Redondo Beach power plant, which is 8 blocks from my house in Hermosa Beach.</p> <p>Please don't extend operations at the plant.</p>	Please see Master Responses 2.1 and 2.2.
654.02	The noise and pollution from the site have been a bane on the neighborhood for quite a long time, not to mention the impact on marine life and the wetlands on the property. My wife and daughter are sensitive to particulate emissions and there are enough sources in the region without AES continuing to drive the numbers up every time it operates.	Comment noted. Please see Master Responses 2.1, 2.3, 2.4, and 2.5.
654.03	California has a growing glut of power, and the inefficient production at the Redondo plant does not benefit state residents.	Please see Master Responses 2.1 and 2.2.
654.04	Leaving the plant open benefits no one but AES and the new owners of the property.	Please see Master Responses 2.1 and 2.2.
654.05	Both parties knew of the changing regulations that would require the plant to cease operations when their contract was signed and should be held to the scheduled end of operations date on	Comment noted. Please see Master Responses 2.1 and 2.2.

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	12/31/2020.	
655.01	I'm writing in opposition of the proposal to extend operation of the AES power plant in Redondo Beach past its mandated December 31, 2020 decommission date.	Please see Master Responses 2.1 and 2.2.
655.02	The way this plant must be cooled cannot be done in a way that is safe for our ocean, and other more modern and safer plants can provide all the power we need at this time.	Please see Master Responses 2.2 and 2.3.
655.03	Please allow the plant to close as planned.	Please see Master Responses 2.1 and 2.2.
656.01	My husband and I respectfully write to express our opposite to the proposed extension of operations at the AES Redondo Beach Power Plant located at 1100 North Harber Drive in Redondo Beach.	Please also see Master Responses 2.1 and 2.2.
656.02	The extension was recommended for your consideration by the CPUC at their November 7 2019 meeting. We support Alternative 1 in your staff report dated March 18, 2020 – No extensions and secondarily support an amended Alternative 5 that eliminates any extension for any length of time for any of the units at the AES Redondo Beach facility.	Please see Master Responses 2.1 and 2.2.
656.03	These units and this plant should be retired as	Please see Master Responses 2.1 and 2.2.

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	<p>scheduled.</p> <p>The Power Plant site is located within less than a mile of our house. We purchased the house in 2019 and relied on many public statements regarding the plant closing by the end of 2020.</p>	
656.04	<p>The plant clearly has been a concern for its deleterious effect on the environmental health and quality of life. The plant and its acres of radiating power transmission lines have been highly visible sources of noise, visual air pollution, for not only our home and city but the region as a whole.</p> <p>This plant is especially concerning to our family because Alison was diagnosed with Stage 3 ovarian cancer in Feb 2019. After 2 grueling surgeries and many rounds of chemo, the doctors believe she has the opportunity to make a full recovery, however, the dangerous chemicals in the air that are emitted from the power plant could potentially increase a chance of cancer in our family. We are pleading as a family to close this plant on December 31, 2020 as originally planned.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
656.05	We thank you for the work you do for CA and we are very much hoping you will make this incredibly important decision with the residents health at the	Please see Master Response 2.1.

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Letter and Comment Number	Comment	Response
	top of your mind.	
657.01	I've lived in Hermosa Beach and Redondo Beach since 1987. I've always been fascinated that we've had to deal with the eye sore and environmental pollution of the AES Power Plant continuously since then.	Comment noted. Please also refer to Master Responses 2.1, 2.3, and 2.5.
657.02	It's finally time to retire it please! I urge you NOT to extend the retirement date of December 31, 2020.	Please see Master Responses 2.1 and 2.2.
658.01	Please record my opposition to the extension of retirement for the Redondo Beach AES unit.	Comment noted. Please see Master Responses 2.1.
658.02	As a Redondo Beach or Hermosa Beach resident since 1969, currently living 1.7 miles from the site, I have grave concerns over the facility's environmental impact on air quality.	Please see Master Response 2.5.
658.03	Recent studies also show Los Angeles maintains sufficient energy sources not requiring a continuation of the AES operation.	Please see Master Response 2.2.
658.04	I support the planned cessation of operations on Dec 31, 2021 and voice my opposition to any extension.	Comment noted. Please see Master Responses 2.1 and 2.2.
659.01	I am well aware from two decades of staring at AES Redondo and enduring it's periodic, anytime	Please see Master Response 2.2.

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	of the day or night long, deafening startup blasts that AES Redondo is in service maybe 5% of the year solely for sporadic, back up Statewide Grid power generation, despite disingenuous AES spokespeople misleading locals over the years about needing this plant to "keep Redondo Beach lights on" - a flat lie.	
659.02	I am, moreover, acutely aware that AES Redondo generates small particulate emissions that endanger community respiratory health whenever the plant is in service as documented in numerous air quality studies.	Please see Master Response 2.5.
659.03	Redondo Beach has grown up around this antiquated facility to become one of the most densely populated residential communities anywhere on California's 700 mile coastline and can ill afford continuing toxic emissions from this wholly unnecessary plant.	Please see Master Responses 2.1, 2.2 and 2.5.
659.04	It is my expressed hope that CA Waterboard will vote NOT to further jeopardize the respiratory health of the Redondo Beach community by extending the operation of AES Redondo beyond it's previously determined 12/31/20 decommission date.	Please see Master Responses 2.1, 2.2, and 2.5.

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660.01	I fully support and agree with the Mayor, City Council, and all other elected officials in Redondo Beach-all of whom want the Redondo Beach AES Power Plant to shut down as early as possible.	Please see Master Responses 2.1 and 2.2.
660.02	The power plant is scheduled to shut down at the end of this year on December 31, 2020.	Please see Master Response 2.1.
660.03	I have worked hard to be able to live in Redondo Beach and have been saddened by the presence of the power plant for the more than 40 years now. The plant is loud, it emits thick black smoke, and most importantly, releases air contaminants that cause lung illness. We do not want any extension on operations for this plant.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
660.04	Please DO NOT extend its operation.	Please see Master Responses 2.1 and 2.2.
661.01	<p>It is not often that Redondo Beach has a chance to turn a developed plot of land into open space that will be protected forever! Yet, that is where we stand today.</p> <p>As you may know, the power plant that has operated in Redondo Beach for more than 100 years was recently sold. Though it is scheduled to cease operations at the end of 2020, the new owner would like to obtain an extension that will allow the plant to operate through 2023. In</p>	Please see Master Responses 2.1 and 2.2.

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	<p>exchange for the extension, he is willing to guarantee that nearly half of the site will be protected as open space in perpetuity. It is critical that the Water Board vote to support this extension because it is the only way we can guarantee that this land will be protected.</p> <p>I urge you to recognize the unique opportunity before you and join us in supporting the extension.</p>	
662.01	<p>On behalf of the Southern California Public Power Authority (SCPPA), I am writing you today to encourage you to take actions to keep the Resource Adequacy market as broad and competitive as possible.</p>	<p>Comment noted. Please see Master Response 2.2.</p>
662.02	<p>SCPPA's Members operate under strict regulatory requirements and strive to do so in a way that maximizes reliability and operational flexibility in order to minimize the cost to our customers. Resource Adequacy (RA) is one of those requirements for all California Independent System Operator loads. In recent years, the cost for RA has increased dramatically, putting upward pressure on electric rates. To control these costs, utilities need access to power plants that can provide this RA, to ensure grid reliability. This will allow for a competitive market, where we have electric generation resources operational, to help</p>	<p>Please see Master Responses 2.2.</p>

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	<p>control the cost of RA.</p> <p>On behalf our Members we encourage the State Water Resources Control Board to take actions that keeps the RA Market as broad and competitive as possible, thereby reducing cost impacts to our customers, many of who have been impacted due to the COVID-19 crisis.</p>	
663.01	<p>I'm writing in hopes that your group will vote to allow the AES power plant to continue to operate through 2023.</p> <p>The revenues generated during the extension will make it more feasible for the property owner to give the City approximately half of the site so it can be used as open space. Keeping the plant open will also generate millions of dollars that will be used to clean up the environmental contamination on the site which will help clear the way for the land to be developed in the future.</p>	Please see Master Responses 2.1 and 2.2.
663.02	<p>If the plant is forced to close at the end of this year it is very likely that the City will lose the open space that has been offered to them and the property owner will probably develop the site as an industrial property. By supporting the extension, it is the only way we can guarantee that</p>	Please see Master Response 2.1.

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	this land be protected.	
664.01	<p>I support a 3-year extension for the AES power plant in Redondo Beach.</p> <p>We are all anxious for the day when the plant closes for good, but it would be the wrong decision to close it at a time when our energy sources are so uncertain.</p> <p>Closure of the Redondo Beach plant would mean that millions of homes throughout Southern California would become even more dependent on out-of-state power sources to keep their lights on, especially during peak usage periods. You only need to look around your house to see the EV cars, computers, tablets, TVs and know that energy usage is only increasing.</p>	Please see Master Responses 2.1 and 2.2.
664.02	If we have learned anything during the coronavirus crisis, it is that planning for the worst-case scenario is critical. Our state should make sure it stays self-reliant, especially when we have the ability to do exactly that. Please keep the AES plant open through 2023.	Please see Master Responses 2.1 and 2.2.
665.01	The City of Hermosa Beach, City of Redondo Beach, Hermosa Beach School Board, Redondo Beach School Board, and Beach Cities Health	Comment noted. Please see Master Responses 2.1.

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	<p>District all unanimously oppose any extension of operations of the outdated, gas-fired generator at the AES power plant.</p> <p>Heal the Bay and Surfrider Foundation are both opposed to any extension of operations at AES.</p> <p>The plant is schedule to cease operations 12/31/2020, and we ask that you ensure that operations cease then.</p>	
665.02	<p>There are concerns about local air pollution and carbon emissions from the aging units which would adversely affect residents in Hermosa and Redondo Beach, as well as the surrounding area.</p> <p>There are 21,000 people living within 1 mile of the AES power plant. The AES facility is on Hermosa’s southern border. AES is across the street from many Hermosa Beach homes. Any extension of its operations will have a significant impact on our residents and businesses.</p> <p>The residents of Hermosa and the Hermosa Beach City Council have voiced their opposition to continued operations of the AES facility because of the noise and pollution from the plant, the harm to marine life, and the impact on property values.</p>	Please see Master Responses 2.1, 2.3, and 2.5.

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665.03	<p>A previous health impact study conducted by the City of Hermosa Beach found- even at 5% production- the AES power plant was the largest source of fine particulate pollution in the area and second only to vehicles in the amount of nitrogen oxide emissions in a one-square mile area.</p> <p>According to the California Air Resources Board and the American Cancer Society, exposure to fine particulate emissions kills more than double the number of people who die from breast cancer in California.</p> <p>It's clear that air quality in our City and the surrounding area will improve significantly when this plan is permanently closed, and the public's health will benefit.</p>	Please see Master Response 2.5.
665.04	<p>A private party recently purchased the property with the aim of redevelopment. Meanwhile, Redondo Beach has been working hard with the State and County to direct monies to this site to assist with redevelopment to maximize open space and public uses such as a park, and restore wetlands. But now, AES and the new owner are going to benefit financially if the plant operation is extended. Unfortunately, this is all at the expense of the residents of Redondo and Hermosa.</p>	Please see Master Responses 2.1, 2.2, and 2.4.

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665.05	This is a historic opportunity to restore coastal wetlands. It will turn a highly polluting area into an extremely effective carbon sink because wetlands are effective at capturing and storing carbon.	Please see Master Responses 2.1 and 2.4.
665.06	Retiring the AES plant and restoring coastal wetlands will also improve ocean water quality, help protect marine life, and provide needed habitat for migrating birds along the Pacific Flyway and for native flora and fauna.	Please see Master Responses 2.3 and 2.4.
665.07	They are already, unexpectedly extending the retirement date of three other large power plants in this area. We don't need AES Redondo for grid reliability.	Please see Master Response 2.2.
665.08	As the LA Times reported, California has a big, and growing, glut of power. The LA Times found that the state's power plants are on track to be able to produce at least 21% more electricity than California needs.	Please see Master Response 2.2.
666.01	We are writing to express our complete support for the proposed extension of operations for the AES power plant in Redondo Beach. While we all look forward to the day when the plant is finally torn down and something new is built in its place, we recognize that the land could ultimately be used for anything from homes and offices to	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>hotels and retail. We have lived through decades of land-use fights in our community about precisely that. The extension would eliminate much of that. It would guarantee that half of the site would be preserved as open space in perpetuity, regardless of what kind of fight ensues over how the other half of the site is used.</p> <p>Moreover, the new owners of the power plant will agree to provide \$14 million to clean up the site and make progress in removing the transmission lines that run along Anita and 190th Street. As lifetime South Bay residents and long-time (25 years+) Redondo Beach residents/homeowners, we welcome positive changes to our City that will benefit all. If it means we have to put up with three more years of our beautiful view being marred by a power plant that was planned to be razed at the end of this year, so be it. Please enable us to secure these important community benefits by granting the three-year extension. Three more years of operation will enable us to save 25 acres of open space forever, which is the opportunity of a lifetime.</p>	
667.01	<p>I have been a homeowner in Redondo Beach for 45 years, and have long wanted the power plant shut down. Located on the southern end of the beautiful Santa Monica Bay, it is in the midst of two very densely packed communities -- Redondo</p>	<p>Please see Master Responses 2.1, 2.2, 2.3, and 2.5.</p>

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	<p>and Hermosa Beach, spewing harmful pollutants into the air and destroying aquatic life through its ocean water cooling systems. I've worked to have the plant removed and was pleased when it was ruled that this type of plant had to be removed or replaced by 2020. Many members of the community worked to disallow a replacement, and we won. We felt assured it would be shut down. Now it's 2020, and you say it might continue to pollute for three more years. Enough! Close it down in 2020 as planned for the health and well being of people and ocean.</p>	
668.01	<p>I am writing to support the AES request to continue operations of its Redondo Beach power plant site for three more years.</p> <p>For many years, I have worked in Redondo Beach as a pastor, linking people and churches who are committed to building strong marriages, developing confident parents and empowering kids. In many ways, there is nothing more important to developing strong communities than having safe and welcoming places where people can gather, play and enjoy their families. Unfortunately, like many Southern California communities, Redondo Beach is in desperate need of more of these places.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	<p>The proposal in front of you would provide a roadmap for Redondo to increase its open space. If the power plant is allowed to continue its minimal operations for another three years, the property owner will guarantee that 25 acres would remain open space no matter what is ultimately developed at the site when the plant is retired at the end of 2023. In addition, he will pledge \$14 million to plan the new open space, engineer the removal of the transmission lines and more. I hope you will join me and my neighbors in supporting this proposal and grant AES the three-year extension it is seeking.</p>	
669.01	<p>The life of the AES should not be extended beyond December 2020. The fumes from the plant are polluting our air and damaging the health and wellbeing of our community.</p>	Please see Master Responses 2.1, 2.2, and 2.5.
670.01	<p>As you may be aware, the AES powerplant site in Redondo Beach was recently sold, and the new owner has put together a plan that would not only result in the closure of the plant, but would provide a way for our community to maintain half of the site as open space. I am writing you to express support for a three-year contract extension for the Redondo Beach power plant, which would allow the plant to remain active until December 31, 2023 and enable our community to secure 25 acres of</p>	Please see Master Responses 2.1 and 2.2.

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	<p>the site as open space - forever.</p> <p>Our community certainly wants to see this plant close down and the property be redeveloped. Under this new plan, the new owner would reserve 25 acres, or approximately 50% of the property, for public open space and related amenities. The plan would also provide \$14 million for site clean-up, remediation and engineering to remove transmission lines along the entry to King Harbor. This is a tremendous opportunity for our community to re-envision the AES site as a true benefit for our neighborhood, but we need the help of the Board State Water Resources Control Board to make this reality.</p> <p>I urge you to approve the three-year extension so our community can take advantage of this opportunity.</p>	
671.01	<p>I am writing you to express my support for a three-year contract extension for the Redondo Beach power plant, which would allow the plant to remain active until December 31, 2023.</p> <p>As the President of The Los Angeles Ministers/Pastors Form and Pastor of Believers Christian Church, I am compelled to speak out on behalf of communities of color that continually</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2. Please also refer to Sections 5.5 and 5.6 of the Staff Report, which have been revised to include a discussion on environmental justice.</p>

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	<p>face disparity of treatment between themselves and affluent white communities.</p> <p>The California Public Utilities Commission (PUC) projects significant resource adequacy (RA) shortfalls in the coming years, and it is essential that all communities carry the responsibility of ensuring that the energy grid is supported and continues to provide services for the most vulnerable among us. As we all know, disadvantaged communities, which are predominantly communities of color, are hit hardest with brownouts and blackouts.</p> <p>The Ormond Beach Once-Through Cooling (OTC) Generating Station received a recommendation for a three-year extension to support the region's energy demands, located in a predominantly Black/Latino community, while the OTC plant in Redondo Beach, a predominately affluent White community, is currently being considered for a one-year extension, despite the original recommendation being for a three-year extension. Such disparities are what perpetuates the disenfranchisement of communities of color.</p> <p>The families surrounding the Ormond Beach plant will have to tolerate another three years of operation, and it only seems fair that Redondo</p>	

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	<p>Beach also share in the responsibility of helping to ensure that all communities have energy security, especially as we are experiencing such uncertain and difficult times.</p> <p>To not support a three-year extension at the Redondo Beach power plant would have a direct impact on our disadvantaged communities.</p> <p>I hope you will keep in mind how our most vulnerable communities are continually hit the hardest by the unintended consequences of decisions driven by the most privileged, and urge you to approve the three-year extension for the Redondo Beach power plant to allow it to support our energy needs now and in the coming years.</p>	
672.01	<p>I am writing to urge you to support a three-year extension of operations for AES’s Redondo Beach power plant.</p> <p>I know how difficult it is to balance community benefits versus community impacts in a situation like this, but I hope you will look at the long-term benefits of keeping the plant open for just three more years.</p> <p>The new owner of the site has proposed a plan that would enable our community to preserve nearly half of the 51- acre site as open space in</p>	Please see Master Responses 2.1 and 2.2.

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	<p>perpetuity. At a time when our community struggles to find small plots of land for “pocket parks” and has to twist the arms of developers to include open space in their projects, this deal would enable us to permanently save a large and meaningful swath of open space near the coast – something our city desperately needs. In addition, a three-year extension would mean that the developer would contribute \$14 million to clean up the site and do the engineering work to remove the transmission lines that run through the city– a financial burden that would not impact our precious city funds during an unprecedented time of fiscal uncertainty.</p>	
672.02	<p>Moreover, allowing the plant to remain open until 2023 will provide another important benefit for our city and the entire region. Though the plant would not operate above its current 3% level, just having the potential for emergency energy generation is an important consideration, especially at a time when we are wrestling with a global pandemic and wildfires threaten our system’s ability to provide the energy we need.</p> <p>As decision-makers who have to weigh short-term impacts versus long-term benefits, I know you may wrestle with this decision, but I urge you to think about our children and grandchildren. They</p>	Please see Master Responses 2.1 and 2.2.

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	<p>will be the ones who benefit from your choice. They will be the ones who will benefit from your foresight. They will be the ones who will have open space to enjoy with their families. I wholeheartedly support a three-year extension, and I hope you will, too. Thank you.</p>	
673.01	<p>I am writing to you today to express support for a three-year extension for the Redondo Beach power plant, allowing it to remain active until December 31, 2023. Through the Los Angeles/Orange County Building and Construction Trades Council, many young adults who have played in our soccer league have been able to establish careers servicing the energy needs of the state by working on this type of project. This extension will help avoid any potential blackout issues at a time when we cannot afford to take the kind of risk that could endanger the lives of those who are vulnerable.</p> <p>Making sure the basic infrastructure needs of the City, County and State are met should be a top priority for any elected or appointed official. That's why, as a longtime community member and parent, I urge the State Water Resources Control Board to support this much needed extension.</p>	Please see Master Responses 2.1 and 2.2.

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674.01	<p>There is nothing more important than our coastline, and we all need to work diligently to protect and improve it. It may seem counter-intuitive, but I am writing to advocate for a three-year extension for the operation of the AES power plant. I believe that is the best way for us to protect and improve the coastline we all hold dear for several reasons.</p> <p>With the extension, the current owner will have time to begin re-developing certain parts of the property which are not involved in the “ready state” portion desired by the State. In addition, the owner can submit (and hopefully get approval for) plans to redevelop the portions of the property which will be “kept ready” for power production by the State lease.</p> <p>As we all know, the final approval of ANY plan for redevelopment of this property is likely to take at least 3 years. Without the extension, the owner will be at a standstill, and rezoning of any portions of the property for improvement will not likely move forward. AES property could lay fallow for decades, deteriorating and becoming even more of an eyesore. Without the extension, the property owner’s most likely development plan would be to retain the existing zoning and redevelop the site into another industrial use – one with limited open</p>	Please see Master Responses 2.1 and 2.2.

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	<p>space and what could be another 100-year lifetime. I, as many, want that AES power plant eyesore and eco-damaging operation out of the South Bay. However, the best plan for this to ACTUALLY happen, at the soonest time possible, appears to be by allowing for the 3 year extension. Redondo Beach should extend operations for three years, collect on the offer for millions in clean-up dollars, and secure the guarantee to preserve 50% of the property as open space forever. Sometimes a little short-term pain (limited operation of the plant for three more years), is well worth the long-term gain (a cleaned-up property that is half open space forever).</p>	
675.01	<p>If AES is willing to give up the land there should only be a full restoration of the site to what it was like 150 years ago. No more homes!!!!!!!!!!!!!!</p>	<p>Comment noted. Please also refer to Master Response 2.1.</p>
676.01	<p>I write in support of the proposal from AES and the new owner of the site to agree on a date certain to close the AES Redondo Beach power plant on or before December 31, 2023, in exchange for the public benefits that the new owner of the site has committed to provide. My interest in this issue is long-standing.</p> <p>During my time in the Assembly, I successfully included in the then developing bipartisan park</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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	<p>bond legislation (ultimately passed by the voters of California in 2018) language that would make it possible to use park bond funding to purchase a portion of the AES site for public use. I am proud of the role I played that has the potential to help create new open space in one of the most densely populated areas of Los Angeles County.</p>	
676.02	<p>Yes, it would be nice to have the AES plant gone now, and a nice public park in its place, without anybody needing to pay for it. But in the real world, the site will need extensive and expensive refurbishment after the electric plant is decommissioned. There is no obvious source for these funds, and as COVID-19 lays waste to state and municipal revenue streams, it is hard to imagine such funding sources anytime soon.</p> <p>The proposal from AES and the new owner of the site - that in exchange for a three-year extension of the AES plant's operating life, they will provide \$14 million for site clean up activities, will set up to 25 acres of the site aside for public use, and will give the City of Redondo Beach an option to acquire up to 15 acres - is a win/win that provides near-term insurance for our electric grid, a date certain to close the plant, and funding to get from the current status quo to a valuable community resource. After well over a decade of controversy,</p>	Please see Master Response 2.1.

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	I hope we can agree on this plan and make sure that the residents of Redondo Beach will see these benefits on a firm schedule.	
677.01	I live in Redondo and I want the plant to close no later than December 31, 2020. Please make a choice for our health. Health First.	Please see Master Responses 2.1 and 2.2.
678.01	As you review a proposed extension of operations for the AES Power Plant in Redondo Beach, I hope you will consider the important benefits such an extension would bring to the city and the surrounding community.	Comment noted. Please see Master Responses 2.1 and 2.2.
678.02	This plant has been in operation for more than a century, and allowing it to continue to operate for three additional years with very minimal output as it has recently would enable Redondo Beach to take advantage of the Community Benefits Package being proposed by the new owner. These are benefits that will extend far beyond the city border and would mean that children and families throughout the South Bay could enjoy the new open space that would be created. In my community I serve as a member of the Torrance Unified School District Board of Education, I know how critical park and open space is to the development of strong, healthy and well-adjusted children. The ramifications of your decision will	Comment noted. Redondo Beach was built between 1954 and 1967. Please see Master Responses 2.1 and 2.2.

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	<p>impact children for decades to come since this open space will be available to the public forever.</p> <p>This would be a true victory for our community, and I hope you will agree and approve the three-year extension. Thank you for considering these issues as you make your decision.</p>	
679.01	<p>There is now a final sale of the plant and the purchase agreement directly addresses future open space for the site. The final deal for the property's sale outlines a Community Benefits Package designed to address the creation of parkland on the site. The deal yields a greater amount of available land for a park plus funding for remediation based upon the term of any extension of the plant operation. Currently generating power to only 3% of its capacity, the limited amount of environmental damage caused by extending the plant's operations through 2023 must be weighed against the opportunity to maximize possible parkland in the future. Should the plant shut down at the end of 2020, there will likely be no open space beyond the Coastal Commission's required wetlands. That opportunity expands to 25 acres of open space with the extension of the plant's operation through 2023, plus approximately \$14 Million for environmental</p>	<p>Comment noted. Please also refer to Master Responses 2.1, 2.2, and 2.4.</p>

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	clean-up.	
679.02	<p>Please also consider that the new property owner has stated that, unless there is an operating extension and he receives money from AES for remediation, he will not proceed with any site cleanup until he has entitlements for his proposed development, whatever that may be. Considering his proposal would likely require a zoning change, that would trigger the requirement in the Redondo Beach Charter for a public vote. Regardless of the outcome, it can easily be projected that the vote is unlikely to occur within the proposed 3 year extension, since the new owner does not even have a proposed plan yet.</p> <p>I suggest that the interests of the residents of Redondo Beach would be better served by allowing the plant to operate through 2023. That would yield an immediate start of property remediation plus the maximum amount of open space. Otherwise, the City will likely see an abandoned plant sitting idle for numerous years with neither clean-up nor even wetlands restoration occurring for a significant period of time.</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.
680.01	I encourage you to support a three-year extension of operations at the Redondo Beach power plant. I	Please see Master Responses 2.1 and 2.2.

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	<p>am a 33 year resident and I had a beautiful view of the power plant when it fully operational and had 8 smokestacks! Now it is down to only 2!</p> <p>It must sound strange for someone who has always wanted to eliminate the plant to ask for an extension of its operations, but an operating extension would have several important benefits for both Redondo Beach and all of Southern California. First of all, keeping the plant going for a short time would provide us with energy reliability as we work though the impacts of the coronavirus shutdown. No one knows what things will look like on the other side of this crisis, so the best thing we can do is be prepared for every eventuality. Second, the new owner of the plant will enter into an iron-clad agreement that will guarantee that 25 of the plant’s 51 acres will be protected as open space and amenities.</p> <p>This is critically important in an area where every square inch of open space is highly valued. Finally, by granting the three-year extension, AES will agree to funding \$14 million of the site’s clean-up expenses. It is one thing to wish and dream about what the power plant could become and it is another to have the funds available to make that dream a reality. This money will go a long way in making sure the vision for that site can be</p>	

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	<p>achieved.</p> <p>Another three years of plant operations is a small price to pay to make all of this happen. Please vote to support the extension.</p>	
681.01	<p>I am writing to express my support for the continued operation of the AES power plant in Redondo Beach through 2023. Of course, we all want to see the plant shut down quickly, but the bigger priority is to see the property remediated and redeveloped as soon as possible.</p> <p>Extending the plant for three years best achieves this primary objective. The South Bay has lived with a power plant at this site for nearly 125 years. It barely operates anymore, and while we would prefer it didn't operate - three more years of very limited use is a small price to pay for the promise of more quickly opening the site to parks, wetlands and other public amenities. Redondo Beach has a beautiful coast and harbor. The offer on the table from the AES site's new owner would guarantee 25 acres of open space in exchange for three more years of plant operations, so supporting this extension would mean that more people would be able to access the area than ever before.</p>	Please see Master Response 2.1.

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	This is a golden opportunity to save and create new open space for everyone to enjoy. I hope you will support the three-year extension.	
682.01	I am in extreme opposition of allowing the Redondo Beach Refinery to stay open another 3 years! The pollution is causes, the harming of our ocean life and the incredible eye-sore that it is needs to finally be stopped and eliminated! I am born and raised in the south bay and have been staring at it for over 50 years. But the fact that you have allowed it to stay open this long is shameful! It needs to STOP! PLEASE PLEASE PLEASE honor the original agreement of it shutting down this year. The community will be forever changed for the better once it is gone!!!	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
683.01	I hope you will join me in supporting a three-year extension for the AES powerplant in Redondo Beach because such an extension would enable us to turn 25 acres of the existing site into public open space. This is no small opportunity. The national average park space in cities is 16 acres per thousand residents. Redondo Beach, though, has a paltry 2.45 acres per thousand residents – including the beaches. Overall, the South Bay is considered “park poor,” and the opportunity to secure 25 acres of open space in perpetuity	Please see Master Responses 2.1 and 2.2.

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	<p>should not be underestimated.</p> <p>We all know the benefits of open space. It increases economic vitality, enhances quality of life and helps keep residents and visitors healthier. The guarantee that half of the site would be preserved as open space in perpetuity applies regardless of what is proposed and built on the remainder of the site. I hope that you will agree with me and my neighbors that open space is precious and chance to save this land from development far outweighs any impacts from allowing the plant to continue to operate through 2023.</p> <p>Thank you for your consideration of this important issue, and I urge you to approve the proposal for a three-year extension of operations.</p>	
684.01	<p>I am writing to you today to express support for a three-year extension for the Redondo Beach power plant, allowing it to remain active until December 31, 2023. Through the Los Angeles/Orange County Building and Construction Trades Council, many former homeless members of our community have been able to establish careers servicing the energy needs of the state by working on this type of project. This extension will help avoid any potential blackout issues at a time</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	<p>when we cannot afford to take the kind of risk that could endanger the lives of those who are vulnerable. The healthcare system needs their energy needs to be met and we have the trained and qualified workforce to ensure that it happens.</p> <p>Making sure the basic infrastructure needs of the City, County and State are met should be a top priority for any elected or appointed official. That's why, as a longtime community member and parent, I urge the State Water Resources Control Board to support this much needed extension.</p>	
685.01	<p>On behalf of United Association, Local 250, I am writing to express our support for a three-year contract extension for the Redondo Beach power plant, allowing the plant to remain active until December 31, 2023. The California Public Utilities Commission (PUC) projects significant resource adequacy (RA) shortfalls in the coming years, and various California energy agencies have acknowledged that the Redondo Beach Once-Through Cooling (OTC) power plant should remain in operation to address this shortfall.</p> <p>With the current and foreseeable delays on solar power and storage projects due to COVID-19 and supply chain slowdowns, we are facing an extremely uncertain time in the power market and</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2. Additionally, the next CEC Integrated Energy Policy Report, which may discuss the impacts of COVID-19, will not be released until January 2021 at the earliest, which is after the four facilities are scheduled to comply with the OTC Policy. The CPUC has also established a process to track the procurement and development of the new resources and will report quarterly to the State Water Board. It is appropriate for the SACCWIS and amendment process to proceed now and not wait for additional information on potential delays due to COVID-19. The Amendment recommending compliance date extensions to address grid reliability concerns is unanimously supported by the CEC, CAISO, and the CPUC, and is based on currently</p>

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	<p>the Redondo Beach power plant is more essential than ever to support the energy grid.</p> <p>A three-year extension will provide an assurance that the greater Los Angeles region will be spared from potential blackouts during the hottest summer months to come, as well as from the impacts we are seeing due to COVID- 19.</p> <p>Given the unprecedented challenges we are facing, we need all available energy options for our workforce to do their jobs effectively and strongly urge you to support a three-year extension for the Redondo Beach plant.</p>	available information.
686.01	I live in Redondo Beach and get the smoke and steam and downdraft from the Redondo Beach AES power plant. I have developed asthma since I moved here. The plant is also noisy. The loud outburst of steam on high power usage days startles me a lot.	Comment noted. Please see Master Responses 2.1 and 2.5.
686.02	It is an old power plant, built in 1907 by Southern California Edison (https://en.wikipedia.org/wiki/Moonstone_Beach) and should be shut down. Surely there are more efficient power plants which can be used in place of this old plant.	Comment noted. Please see Master Responses 2.1 and 2.2. Please also see response to comment 678.02.

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	Please do not extend their operating time beyond December 2020. Please close the AES power plant!	
687.01	<p>I am writing to express my support for the three-year contract extension for the Redondo Beach power plant, thereby allowing the plant to remain active as needed until December 31, 2023.</p> <p>I do look forward to seeing this plant ultimately close down and the site redeveloped. But before that happens, we have the opportunity to both secure open space at the site as well as secure the required critical funding. The city cannot afford to pay what’s required on its own to decommission the power plant.</p> <p>The power plant now has a new owner, a real proposal, and a practical plan to retire the power plant once and for all. With this three-year extension, Redondo Beach would be assured of a plan that will expedite the remediation and redevelopment of the site, and preserving nearly half of the site as public open space in perpetuity. Extending the operation of the plant for just 36 months is a small price to pay for land that will benefit our children, grandchildren, and our entire community for many years to come. I urge you to approve the three-year extension for the Redondo</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	Beach power plant for the benetit of all.	
688.01	I'm writing to convey my disappointment in the California State Water Resources Control Board for entertaining the idea of extending operations of the AES power plant in Redondo Beach. AES committed to closing the plant by 12/31/2020, and they should be held to that commitment. I understand - and share -the concern for wanting to ensure adequate power supply, but the writing is on the wall. The technology in use is woefully inefficient and harmful; to the local marine ecosystem, to the atmosphere, and to my 2 children (Ages 7 and 2) that live and play in close proximity to the plant. In fact, I was on the beach with my family a few months ago when black smoke started billowing from the smoke stacks. My 7 year old asked what was on fire and I told him they were just producing energy at the power plant. He asked "Why does it look so bad? Why don't they just use solar panels instead of polluting so much," and I told him "some day they will, they're just very slow to change."	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
688.02	I've seen comments in the press from AES representatives saying the Covid-19 crisis is a reason to keep the plant operating, to ensure our hospitals have enough power. That's a fair concern, but I've seen several mega-corporations	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>make 3 years worth of changes to their organizations, their operations, and their budgets within the last 2 months in response to the crisis. A compelling event can lead to drastic change in a short period of time, but “kicking the can down the road” for several more years will ensure the status quo (which hurts everyone, except for AES’ bank account). AES has had a decade (at least) to prepare for this. I can’t help but think of (the admittedly snarky) comment “the failure to plan on your part does not constitute an emergency on (the people of Redondo Beach’s) part.”</p>	
688.03	<p>I know they’re converting to solar and battery backup in Long Beach, and I applaud the effort, but delaying the inevitable in Redondo Beach, harming our environment and our people in order to reduce AES’s capital expenditures is not the right answer. People shouldn’t subsidize a corporation with their health. AES’ income has ranged between the hundreds of millions to nearly a billion dollars a year the last couple of years. Let’s rip off the band-aid by holding them to their commitment of closing the plant by the end of this year, improve our environment and our health drastically in a short period of time (while my kids are young enough to benefit from it), and help AES move forward with more sustainable energy creation solutions we all know our city, country,</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	and world need.	
689.01	<p>Today, we have that opportunity, and I am writing to ask for your support. Your vote to extend the operation of the AES power plant in Redondo Beach would enable the city to take advantage of a beneficial package being offered by the site's new owner. The package would include \$14 million to accelerate site clean-up activities, open space planning and the engineering needed for the removal of the overhead power transmission lines. It would also guarantee that 25 acres, nearly half of the site, would remain open space no matter what else is ultimately built at the site. Finally, it would allow the entire region to benefit from three more years of emergency energy availability during a period of time that is truly uncertain and Southern California faces a power grid that often cannot cope with intense demand.</p> <p>There are very few chances to create new open space in our city, and I hope you will join the effort to do everything we can to make sure this land is protected, while also getting critical clean-up funding and enhancing the region's energy reliability. Please vote to support the three-year extension at the plant.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
690.01	As a resident of Hermosa Beach, I ask that you do	Comment noted. Please see Master Responses 2.1,

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	not extend the use of the AES Redondo power plant beyond this year. It is polluting our air, destroys the marine life and is the least efficient of the four coastal power plants ordered to cease by the California State Water Resources Control Board.	2.2, 2.3, and 2.5.
691.01	On behalf of the Latino Educational Fund, I am writing to express our support for a three-year contract extension for the Redondo Beach power plant, allowing the plant to remain active until December 31, 2023.	Comment noted. Please see Master Responses 2.1 and 2.2.
691.02	<p>California energy agencies acknowledge that the Redondo Beach plant should remain in operation due to the state’s energy resource adequacy shortfall. Even more troubling is what we’re seeing on the frontlines and the slowdown of the supply chain and approval processes due to COVID-19. With the current and foreseeable delays on solar power and storage projects that were expected to come on-line to support our energy demands, we are facing an extremely uncertain time in the power market.</p> <p>A three-year extension will provide an assurance that the surrounding area will be spared from potential blackouts during the hottest summer months to come, as well as the impacts we are</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>seeing due to COVID- 19. The Latino Educational Fund would appreciate the State’s support in ensuring that the workforce have the tools to keep the lights on for our communities. Given the unprecedented challenges we have experienced with the Grid the last several years, we need all available energy options for our workforce to do their jobs effectively and strongly urge you to support a three-year extension for the Redondo Beach plant.</p>	
692.01	<p>I am writing today to provide my support for a three-year extension of the operations at the AES plant. For years, I have lived with the plant and will certainly look forward to the plant being closed and developed properly. As you know, development in Redondo Beach is very controversial. We are all concerned about what will replace the plant when it finally closes. By granting the three-year extension, you will be helping me and my neighbors achieve something that is rarely seen in this area; the creation of public open space. The new owner of the site has guaranteed that if the power plant is allowed to continue its minimal operations for another three years, he will guarantee that 25 acres will be preserved as open space regardless what is built on the property. This will be a tremendous gift to Redondo Beach and our neighboring</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	<p>communities. We wouldn't have to battle with the owner to get this open space. The space would just be given.</p> <p>Another three-years of plant operation would be a small price to pay for a chance to secure the open space forever. Please help us by voting for the three-year extension!</p>	
693.01	<p>We recognize what the plant has done for more than 100 years to provide jobs and energy to our area, but we all are looking forward to the day when it is shut down and the land is redeveloped. That is why I am writing to ask you to support a three-year extension of operations at the plant through the end of 2023.</p> <p>It seems odd that someone who would like to see the plant go away is writing to ask for it to continue to operate for another three years, but this is truly the best way for the property to be cleaned up and redeveloped as soon as possible. Three more years of limited use is a small price to pay so that we can more quickly open the site to parks, wetlands and other public amenities. The property's new owner has guaranteed that nearly half of the 51-acre site would be preserved as open space in perpetuity and that \$14 million in clean-up funding would be provided in exchange</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.

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	<p>for three more years of plant operation. That is a deal I'd take every day of the week!</p> <p>Please allow the plant to continue to operate until 2023 so that everyone in the South Bay can move closer to having the plant retired, torn down and redeveloped with a significant portion reserved as open space.</p>	
694.01	<p>I'm emailing to ask for your support in extending the operation of the AES Plant in Redondo Beach through 2023. I run a hyper-local website highlighting events and happenings throughout the South Bay and I know what locals are really hoping for. EVERYBODY wants the AES power plant closed BUT, we want to know exactly what the plan will be going forward.</p> <p>We don't want to deal with an obsolete eye sore for several more decades while the city and the property owner argue about what should go there and who will pay for it. By extending the operation of the plant (which only operates at 5% of capacity anyway) for another three years, Redondo will be guaranteed millions of dollars for clean-up and the security of knowing that 25 of the 51 acres of the site will be saved as permanent open space. We ALL want to see the plant closed, but we also want to make sure any future development is</p>	Comment noted. Please see Master Responses 2.1 and 2.2.

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	<p>appropriate to our beach-centric lifestyle. An extension is the smartest, quickest and most secure way to make sure Redondo gets what it needs. I appreciate your consideration and hope you will support the extension.</p>	
695.01	<p>South Bay Parkland Conservancy (SBPC) is opposed to any extension of the compliance dates for the remaining Redondo Beach OTC Units 5, 6, and 8. Our opposition is summarized in the following major points:</p> <p>There is no opposition to the continued operation of the other three sites, Huntington, Alamitos, and Ormond Beach.</p> <p>There is excess margin in the combined capacity of the three remaining sites to meet the contingency need without any capacity supplied from Redondo units.</p> <p>The March 18 Staff Report does not examine the very obvious alternative of extending Huntington, Alamitos and Ormond Beach units while retiring Redondo units on schedule.</p>	Please see Master Responses 2.1 and 2.2.
695.02	<p>Redondo is the only plant with an existing active wetlands in the plant operational confines.</p> <p>The active wetlands serves a large variety of</p>	Comment noted. Please see Master Response 2.4

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	<p>marine birds along the Great Pacific Flyway as documented by the local chapter of the Audubon Society.</p> <p>These marine birds include species of special concern.</p>	
695.03	<p>AES Redondo is under a California Coastal Commission cease and desist order to prevent operation of dewatering pumps that would dry up the existing wetlands.</p> <p>AES Redondo has protested in writing that this cease and desist order puts power plant machinery and personnel at risk.</p> <p>AES was recently “caught” illegally running the dewatering pumps by Audubon members cataloging the marine birds on the site.</p> <p>The dewatering activity dropped wetlands water depth by approximately 2 feet in less than a week.</p> <p>AES only stopped dewatering after inquiry from Coastal Commission staff. Per AES’ own actions and testimony it cannot operate safely without dewatering the active wetlands and putting the wetlands at risk.</p>	Please see Master Response 2.4.

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695.04	\$4.8M in grant monies for restoring the wetlands is in jeopardy if the plant is extended.	Please see Master Response 2.4.
695.05	<p>Redondo is the only power plant closely bordered on all sides by high density residential, recreational, and visitor serving hotel, retail and restaurant uses.</p> <p>There are high density multi-family units in close proximity on all four sides of the AES property.</p> <p>A Salvation Army senior housing facility directly borders the AES property.</p> <p>To the west is the largest marina in the only harbor in the 25 miles of coastline between Marina Del Rey and the Port of Los Angeles.</p> <p>No other power plant has 21,000 people within a one mile radius.</p> <p>There are schools serving over 6000 children within this one mile radius.</p> <p>A Beach Cities Health District medical facility and assisted living facility is upslope and directly downwind from the Redondo plant.</p> <p>There are three hotels and a public gym within</p>	Comment noted. Please see Master Response 2.1.

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	100 yards of the power plant property.	
695.06	<p>The topography downwind of the power plant slopes up rapidly to the same height as the power plant smokestacks exposing residents, school children, medical facility staff and patients, and park goes directly to the exhaust plume of the power plant.</p> <p>This situation is exacerbated by the frequent marine layer/temperature inversion that traps plant pollutants close to the ground.</p> <p>The situation is also exacerbated by the age and inefficiency of the 50+ year old Redondo units and related systems.</p>	Comment noted. Please see Master Responses 2.1, 2.3 and 2.5.
695.07	Finally, page 14 of the Staff Report dated March 18, 2020 clearly states “Redondo Beach is the least efficient, requiring more OTC intake to produce a megawatt-hour than the other power plants, and resulting in potential impacts to marine life.”	Please see Master Response 2.3.
695.08	<p>Please, refer to the photos at the end of this letter for pictures that provide a better context for SBPC’s position.</p> <p>No other power plant has active wetlands onsite that create a hazard to plant operation. No other</p>	Comment noted. Please see Master Responses 2.1, 2.2, and 2.4.

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	<p>site requires the decision to either drain an active wetland or safely operate the plant. No other power plant is so tightly surrounded on all sides by high density residential and other incompatible uses. No other power plant puts millions in grant monies at risk. Every other site is more efficient than Redondo.</p> <p>With no opposition to the running of the other three sites and excess capacity margin without Redondo units, it makes no sense to extend Redondo's compliance date.</p> <p>Based on all the facts, SBPC requests:</p> <ol style="list-style-type: none"> 1. the Water Control Board require the analysis of an alternative without any extension of Redondo unit compliance date; and 2. The Water Control Board reject any extension of Redondo unit compliance dates. 	
696.01	I am writing on behalf of the Independent Energy Producers Association to support a three-year extension for the Redondo Beach once-through cooling (OTC) power plant. Extending this plant for three years supports electric grid reliability and jobs amid a period of economic turmoil, without	Comment noted. Please see Master Responses 2.1 and 2.2.

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	impacting the state’s ability to reduce water flows to targeted levels under its OTC policy.	
696.02	<p>Nonetheless, amid this period of uncertainty created by the COVID-19 crisis, wildfire risks and Public Safety Power Shutoffs, it only makes sense to keep as many resources available as possible to power our communities and provide insurance to the grid as these new resources feather into the resource base. There is a significant demand for OTC-contingent capacity from the Redondo Beach power plant through 2023, when additional non OTC capacity will be built out.</p> <p>AES has taken significant steps to work with the local community to maximize community benefits as part of its recent sale of the property. The result is a win-win solution for the grid and the community. A three-year extension for the Redondo Beach plant would both maximize grid reliability and flexibility benefits, as well as create new revenue streams to maximize community benefits and accelerate the remediation of the power plant site and its conversion to wetlands and other public open space.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
696.03	Keeping the plant open would not interfere with the state’s ability to comply with the goals of the OTC policy, either. The Statewide Advisory	Comment noted. Please see Master Responses 2.1, 2.2, and 2.3.

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	<p>Committee on Cooling Water Intake Structures has shown that extending all four OTC plants for three years would have a minimal impact on marine water flows and would not affect the state’s ability to meet targeted reductions under the policy.</p> <p>During this unprecedented time of uncertainty and economic challenge, providing a three-year OTC extension to the Redondo Beach power plant increases grid reliability and operational benefits. It maintains compliance with the state’s OTC policy. It accelerates and maximizes community benefits while supporting jobs and the local economy. It may be a small step on the way to economic recovery, but it’s an important one. Especially for the grid, and the people of Southern California.</p>	
697.01	<p>However, I oppose even a one-year extension for three important reasons:</p> <p>1. The power capacity is not needed for local or system reliability.</p>	Comment noted. Please see Master Response 2.2.
697.02	The continued health impacts both to our residents and marine life are significant.	Please see Master Responses 2.1, 2.3, and 2.5.
697.03	There are already plans in place to convert much	Please see Master Responses 2.1, 2.2, and 2.4.

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	<p>of this site and the Southern California Edison power corridor for public use. Continued operation beyond December 31, 2020 will jeopardize already awarded funding and financing for this important restoration for wildlife habitat and public use. I urge you to consider keeping to the original plan to cease operation of the AES power plant on December 31, 2020.</p>	
698.01	<p>It is the opinion of our organization that the power plant should keep running because it is in line with the community's needs and the needs of the region. Currently, the infrastructure that makes sure that Californians have access to safe, reliable, and abundant energy is threatened by a resource allocation shortage. With the advent of COVID-19 and the coming of the hot summer months, it is anticipated that California will again be in need of wise energy management and adequate resource allocation. Along with delays in solar power and storage technology, it would be unconscionable to remove yet another link in the state's network of energy suppliers. The proposed three-year extension will assure that California's energy needs in the coming months and years are more readily met. CREED LA supports this extension because CREED LA supports the workers in every construction and infrastructure industry. The unprecedented challenges ahead</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	<p>will test our economy and our energy market. For the stability of California’s energy future, we urge you to support a three-year extension for the Redondo Beach plant.</p>	
699.01	<p>For at least ten years, I’ve seen many efforts to shut down the AES power plant fail, and I fear we’re headed down the same path again. Inevitably, there will be a great divide over even this proposed 3-year extension of our power plant. This should not be. As someone who lives a driver and 9-iron (please excuse the golf lingo, the shelter-in-place has me pining for Los Verdes:-) away from the plant, no one is more interested in its ultimate closure and the following redevelopment of the site. Fortunately, this 3-year extension seems to provide an opportunity for all sides to find some common ground. As I understand it, this extension will save us \$14 million (since AES would provide that funding for open space planning, transmission line removal and other necessary expenses). Moreover, it will allow us to guarantee significant open space protection. It would seem everyone wants that! It is so important for us to take advantage of every opportunity we can to protect open space and save it so that nothing is ever built on it. By supporting a three-year extension of operations at the AES powerplant in Redondo Beach, you will</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	<p>enable our community to save 25 acres of open space in perpetuity. So, the common ground we can all find here is financial savings and open space protection. Without this 3 year extension, the power plant will remain in place, the future space remains unknown and clean-up activities will be delayed, and that has to be unacceptable to all of us. It is critical that the Water Board vote to support this extension because it is the only way we can guarantee that this land will be protected.</p>	

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700.01	<p>My father was a city council member in the 1960s. A few years back I came across a campaign flyer when he ran for office. One of his major goals outlined in the flyer: “Get rid of the power plant.” That’s how long residents have been trying to rid our city of the power plant (and probably longer than that).</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>
700.02	<p>Redondo Beach residents have been trying to rid our city of the power plant for over 60 years (that I personally have proof of and most likely longer than that) and now we have an offer that states if we wait just three years the power plant will be gone and 50% of the property will be open space and there will be monies provided to start the process of taking out the ugly power lines.</p> <p>This is by far and away the best offer the residents of Redondo Beach have ever received from an owner regarding the 52 acres of precious waterfront property. Why is there even a discussion?</p>	<p>Please see Master Responses 2.1 and 2.2.</p>
700.03	<p>Proposals to get rid of the power plant have come and gone for decades, but none have the promise of the offer the city has on the table right now. I hope you will join me in endorsing a three-year</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2.</p>

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	extension for the AES power plant in Redondo Beach.	
701.01	I am a long time resident of Redondo Beach, and am saddened by the ongoing debate over the potential for operation of the AES Plant beyond December 2020. I recognize that decisions on things are often complicated, and the general public is not always aware of the many factors which go into making important decisions. Yet this isn't so complex, IMHO. The plant is not needed any longer, it's technology is outdated, it is a major polluter, it sits in a wetland, and importantly, the area has evolved, becoming infinitely more congested with residential development in +50 years it is operating...we can continue this long list of important relevant factors.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, 2.4 and 2.5.
701.02	In the end, it could be a part of this board's legacy to make the right call on this one, and stop the plant from operating beyond the end of 2020. Please stop the plant.	Comment noted. Please see Master Responses 2.1 and 2.2.
702.01	I am writing to support a three-year extension for the AES power plant in Redondo.	Comment noted. Please see Master Response 2.1 and 2.2.
702.02	I agree it would be terrific if our city could turn that site into a park once the plant is closed, but I am practical enough to know that something like that	Please see Master Responses 2.1, 2.3 and 2.4.

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	<p>doesn't happen without money. The fact that the land is currently zoned for park and open space is really irrelevant. No developer will build a park without also building something that will generate revenue. And even if the city, which is truly broke, could come up with the money to buy the land from the current owner, it will still take millions to clean up the site since it has been used as a power plant for 100 years.</p> <p>The bottom line is three years in the 100 year history of this operation is nothing. The smart move for Redondo is to allow the plant to operate for three more years, take advantage of the millions of dollars pledged by AES for remediation of the site and execute the agreement with the property owner who has promised to save half the site as open space if operations continue through 2023.</p>	
702.03	<p>Until we recognize that finding funding and sealing an agreement with the property owner to preserve some of the site as open space is our best bet to save this land, the property will languish for years and years. I hope you will recognize this reality and help our city create something great at this site. Please vote to extend the operations of the plant through 2023.</p>	Please see Master Responses 2.1, 2.2 and 2.4.

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703.01	I am adamantly opposed to the extension of the retirement of the AES power plant located in Redondo Beach.	Comment noted. Please see Master Responses 2.1 and 2.2.
703.02	As a member of the South Bay community for over 20 years and a mother of two children, I am very concerned about the air pollution and carbon emissions which the AES plant spews into our environment. There are over 21,000 residents who live within a mile of the toxic plant and are impacted by the fine particulate pollution, even when operating at 5%. According to the California Resources Board and the American Cancer Society, exposure to this kind of particulate matter kills thousands of people annually.	Please see Master Response 2.5.
703.03	There is an historic opportunity here to restore a very precious environment, coastal wetlands.	Comment noted. Please see Master Responses 2.1 and 2.4.
703.04	By retiring the AES plant, we have an opportunity to improve ocean water quality, to help protect marine life and provide a much-needed habitat for migratory birds. I have visited the SEA Lab (the nonprofit aquarium that was housed in a former plant pumphouse) for several years and saw the animals that got trapped in the pumps that are used by AES. The continued operation of the plant	Comment noted. Please see Master Responses 2.2, 2.3, and 2.4.

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	traps marine life against the screening devices and intake structures.	
703.05	The extension of the operation of the AES power plant is totally unnecessary, as well. Reports reflect that California will have more than 20% electricity than it needs in the near future (LA Times).	Please see Master Response 2.2.
703.06	I urge you to please support the closure of this toxic beast and allow the residents who live here to move forward with a plan that supports a healthy environment for all.	Comment noted. Please see Master Responses 2.1, 2.3 and 2.5.
704.01	So I am writing today to encourage the Water Board to grant a three-year extension for the AES power plant, allowing it to continue operations until the end of 2023.	Comment noted. Please see Master Responses 2.1 and 2.2.
704.02	First and foremost, continued operation of the plant will enable the city to benefit from a \$14 million commitment from AES and the new property owner to clean up the site. It will also cause them to set aside 25 acres of the site for use as permanent open space. I believe that this is the best way for our city to move quickly to see the power plant site cleaned up and turned into something from which we all can benefit.	Comment noted. Please see Master Response 2.1.

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704.03	<p>Let's be pragmatic here. Do we really want a retired eyesore of a power plant looming over our community with no plan and no money to clean-up and redevelop the site? Or do we want to allow the plant to operate at its very low levels as it has for more than 100 years while knowing that we are well on our way to making that property something great? I think the answer is obvious.</p> <p>Please vote to support the continued operation of the plant through 2023.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
705.01	Please vote to support the three-year extension for the AES power plant. The extension will give us clean-up money and a guarantee that much of the property will be kept as open space forever. This is the best way for our city to turn the power plant into something that will serve our community well.	Comment noted. Please see Master Responses 2.1 and 2.2.
706.01	I am a resident of Redondo Beach, and I urge you to shut down the AES plant by the end of 2020, in the interest of the health of all South Bay residents. Of course this is more urgent than ever with the arrival of COVID-19.	Comment noted. Please see Master Responses 2.1 and 2.2.
707.01	We are writing regarding the future of the AES power plant site in Redondo Beach and asking you to enable the plant to operate at its current minimal level through December 31, 2023.	Comment noted. Please see Master Responses 2.1 and 2.2.

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707.02	<p>We support removing and repurposing the site, but we also agree that we need to do that responsibly and make sure it gets done for our city. We don't want to see another bait and switch from the city like we have seen from the current mayor. Promises of turning the entire area into a massive park are unrealistic, but the deal that is currently on the table makes sense for our community, while at the same time providing some important energy reliability for everyone.</p>	Please see Master Responses 2.1 and 2.2.
707.03	<p>Extending the operations at AES until the end of 2023 would trigger an agreement with the new property owner that would protect 25 acres as permanent open space (no matter what gets built on the rest of the site) AND provides \$14 million to do clean-up and engineering work needed to clean the site and ready the overhead power lines to be removed.</p>	Comment noted. Please see Master Response 2.1.
707.04	<p>Additionally, letting the plant operate through 2023 would guarantee some critical emergency power generation potential if/when renewable energy production is slowed as the result of the current crisis or during peak usage times when many parts of Southern California see short-term black or brownouts.</p>	Please see Master Response 2.2.

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708.01	<p>I am writing in with my support of a three-year extension of operations for the Redondo Beach power plant and I strongly urge you as Board Members to support the extension as well. A three-year extension at the plant will have some important ramifications beyond simply providing emergency energy generation through 2023.</p> <p>Reading through the generous benefits package the new owner of the site has guaranteed the community, we have an opportunity to give Redondo Beach residents what they deserve as the plant winds to a close.</p>	Please see Master Responses 2.1 and 2.2.
708.02	By extending operation for just three more years, the new owner guarantees that he will protect 25 of the 51 acres of the site as permanent open space. This is important because it means that that land will never become anything but open space forever. And whether it is ultimately used as a park or athletic fields or is simply never built on, it will be a huge benefit for our community.	Comment noted. Please see Master Response 2.1.
709.01	I am writing you to express my support for a three-year contract extension for the Redondo Beach power plant, which would allow the plant to remain active until December 31, 2023.	Comment noted. Please see Master Responses 2.1 and 2.2.

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709.02	I have been a resident of Redondo Beach for 11 years and as such, I am sincerely invested in seeing this plant close down and redeveloped. But it has become apparent that our City leaders are trading the immediate closure of the power plant for an uncertain future for remediation and redevelopment of the site.	Comment noted. Please see Master Response 2.1.
709.03	We have a new owner now who has presented a real proposal to retiring this power plant and a comprehensive Community Benefits Package. With the approval of a three-year extension, our community is assured a plan that includes a funding commitment of up to \$14 million to expedite the remediation and redevelopment of the site, along with the assurance of 25 acres reserved for public open space, and a land option for the city to purchase up to 15 acres of that to further the benefit from this agreement.	Comment noted. Please see Master Response 2.1.
709.04	As a resident who lives steps away from the AES power plant, it would be absolutely devastating to have the power plant shut down in a year without an identified path and date for the closure AND redevelopment of the site.	Comment noted. Please see Master Responses 2.1 and 2.2.
709.05	If your governing body decides to deny the three-year extension, our community will pay the ultimate price of having to live and work next to a	Please see Master Responses 2.1 and 2.2.

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	defunct power plant for upwards of another decade.	
710.01	I am writing today in support of a three-year extension of operations at the AES power plant in Redondo Beach. Our city needs to look to the future and be smart about the decisions made today that will affect our community forever.	Comment noted. Please see Master Responses 2.1 and 2.2.
710.02	Frequently, we look short-term and we miss the important things. No one wants the power plant to run longer than is necessary, but a three-year extension will allow us to protect important open space while guaranteeing a firm closing date of December 31, 2023.	Please see Master Response 2.1.
710.03	I must vote to support the extension and help realize not only the protection of the open space, but also obtain \$14 million that the new property owner has guaranteed for the necessary clean-up and engineering needed to take down the overhead power lines.	Please see Master Responses 2.1.
710.04	Future generations, including those that vote now, will look to this decision to see whether our city jumped at the immediate benefit of shutting down the plant or had a more mindful approach that protected open space and made it possible for remediation of this site. I hope you will make the	Please see Master Responses 2.1 and 2.2.

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	right decision and allow a three-year extension of operations.	
711.01	I am writing to express my support for a three-year contract extension for the Redondo Beach power plant, which would allow the plant to remain active until December 31, 2023.	Please see Master Responses 2.1 and 2.2.
711.02	This is the quickest path forward for getting rid of the power plant and redeveloping the site and would ensure that 25 acres along the coast is preserved for public open space.	Please see Master Response 2.1.
711.03	As a long-time resident of Redondo Beach, I am sincerely invested in seeing this plant closed down and redeveloped. But it has become apparent that our City leaders are trading the immediate closure of the power plant for an uncertain future for the site.	Please see Master Response 2.1.
711.04	The new has presented an actual timeline for retiring the power plant along with substantial benefits to the community. With the approval of a three-year extension, our community is assured a plan that includes a funding commitment of up to \$14 million to expedite the clean-up and redevelopment of the site, along with the commitment of public open space.	Please see Master Response 2.1.

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711.05	<p>If your governing body decides to deny the three-year extension, clean up could be delayed and our community will pay the price of having to live and work next to a defunct power plant for upwards of another decade.</p> <p>As a neighbor of the power plant, it would be absolutely devastating to know it will be shut down in a year without an identified path and date for the closure AND redevelopment of the site. I urge you to think about our community and approve the three-year extension for the Redondo Beach plant.</p>	Please see Master Response 2.1.
712.01	While Dynegy appreciates the need to ensure system-wide grid reliability, there are existing provisions within the OTC Policy to address reliability concerns that do not necessitate the significant OTC compliance extensions contemplated by the OTC Policy Amendment.	Please see Master Response 2.2. Additionally, Section 2.B(2) of the OTC Policy establishes processes for suspension of final compliance dates for existing power plants. The suspension provisions were included in the OTC Policy in the event that CAISO determines that continued operation of an OTC facility is necessary to maintain the reliability of the grid in the short-term. Since the SACCWIS had identified in August 2019 that extension of one or more OTC facilities by two or more years could be required to address grid reliability concerns, it was determined that developing an amendment to the OTC Policy would be the most appropriate path forward rather than using the suspension provisions, which is intended for shorter-term,

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		unforeseen events that require immediate action by the CAISO, CPUC and CEC.
712.02	Further, the OTC Policy Amendment extensions, if adopted, will have the effect of benefitting certain generating stations that are not implementing measures to comply with the OTC Policy, and penalizing facilities, like Dynegy’s Moss Landing Power Plant, that continue to invest significant resources to implement measures designed to benefit the environment and comply with OTC Policy requirements.	The assertion that the Amendment is benefitting some facilities and penalizing others is incorrect. Please see Master Responses 2.1, 2.2 and 2.6, which include information on Track 1 and Track 2 compliance with the OTC Policy, the provisions in the OTC Policy which were followed by the SACCWIS to recommend compliance date extensions to address grid reliability concerns, and CEQA considerations. Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are pursuing Track 1 compliance, which is the required compliance pathway of the OTC Policy unless it is demonstrated that compliance with Track 1 is not feasible.
712.03	Unlike Moss Landing, the Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach generating stations did not elect to make the investments necessary to address the environmental impacts of their OTC units. Accordingly, granting extensions to those facilities will have the effect of loosening environmental requirements for units that chose not to comply with the OTC Policy, and, at the same time, penalizing Moss Landing even though Moss	Please see Master Response 2.1, 2.2, 2.3, and 2.6, as well as response to comment 712.02.

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	Landing is the only facility to invest and pursue full OTC Track 2 Policy implementation.	
712.04	Related to this, the contemplated deferral of “compliance” dates for these facilities is a misnomer because the facilities that would benefit from the OTC Policy Amendment have no intention of ever complying with the OTC policy. Rather, the facilities benefiting from the OTC Policy Amendment elected in 2010 to retire units in lieu of complying with the OTC Policy. Therefore, a decision to defer the dates is really a decision to selectively allow these units to continue to violate the OTC Policy. This is not protective of the environment in any way.	Please see Master Responses 2.1, 2.2, 2.3, 2.5, and 2.6, as well as responses to comments 712.02 and 712.03. The proposed compliance date extensions Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach are intended to address grid reliability concerns, as recommended by the SACCWIS and unanimously supported by the energy agencies in the SACCWIS. The assertion that these facilities would continue to violate the OTC Policy and have no intention of complying with the OTC Policy is incorrect. These facilities have been complying with the OTC Policy and were on track to comply by December 31, 2020. Furthermore, the Amendment does not propose an undefined deferral of the compliance dates. The facilities would be required to come into compliance with the OTC Policy by their amended compliance dates. Additionally, all interim mitigation requirements, including annual interim mitigation payments, will continue to apply to plants with extended compliance dates.
712.05	In addition, the existing OTC Policy already contemplates the possibility that some units would need extensions in order to address resource	Please see Master Response 2.1 and 2.2, as well as responses to comments 712.01 and 712.04. Additionally, please note that OTC

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	<p>constraints that threatened the reliability of the electric system, and thus are provisions within the OTC Policy that create a process by which the California Independent System Operator could, in writing, request to suspend the final compliance date for retiring units for the shorter of 90 days or less, but rather for more than two years, notwithstanding that the unit owners do not intend to make any additional efforts or expenditures to address the impingement and entrainment impacts of those units. If these units are needed for reliability purposes, then the CAISO should make a written request to suspend the OTC compliance deadlines for 90 days or less, as provided in the OTC Policy. Circumventing the defined process for addressing reliability issues creates uncertainty for the market at-large and does not adequately balance the interests of environmental protection and electric grid reliability.</p>	<p>Policy section 2.B(2)(b) provides that suspensions of longer than 90 days require a State Water Board hearing to fully evaluate amendments to the final compliance dates contained in the OTC Policy. The SACCWIS has recommended multi-year extensions for grid reliability. Thus, consideration of amendments to the final compliance dates is appropriate.</p>
713.01	<p>As a member of the Torrance City Council, I have spent years working cooperatively with the jurisdictions that surround us to do what is in the best interests of our entire region. Today, I am writing to you as an individual in support of a three-year extension of operations for the Redondo Beach power plant because of the positive impacts it would have for the entire South Bay.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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713.02	An extension of operations would set into motion an agreement from the new power plant owner to protect 25 of the 51 acres of the site as permanent open space. The agreement would also provide \$14 million in funding necessary to clean up the site and do the engineering work to remove the transmission lines that run along the border of Torrance and Redondo Beach.	Please see Master Response 2.1.
713.03	Perhaps more importantly to those outside of Redondo Beach, the continued operation of the plant through 2023 would allow for enhanced energy reliability for the entire region.	Please see Master Response 2.2.
713.04	At a time when the entire nation is struggling with the COVID-19 outbreak and new energy projects are on hold as the country figures out how to get back to work, we should not be shutting down a power plant that could provide the energy necessary to carry us through the wildfire season and other potential hiccups in the power grid.	Please see Master Response 2.2.
713.05	Keeping that plant operating as we deal with the impacts of the pandemic is important, and if that means additional funding for site clean-up and the protection of open space in perpetuity, all the better!	Please see Master Responses 2.1 and 2.2.

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713.06	I encourage the Board to consider the emergency energy needs of our entire region and grant AES a three-year extension.	Please see Master Responses 2.1 and 2.2.
714.01	As a Real Estate and Mortgage Broker in Redondo Beach, I care deeply about the quality of life in our community. Likewise, my husband, Jerry, an L.A. City Fireman-Engineer, spends his days protecting the community. That is why we are both in favor of a three-year extension of operations for the Redondo Beach power plant.	Comment noted. Please see Master Responses 2.1.
714.02	<p>Over the years, we have seen the city evolve, and Redondo Beach desperately needs more open space. Because our city is fully built out, it is rare to find an opportunity to create new open space, but the AES power plant offers just that.</p> <p>The new owner of the property will dedicate almost half of the AES site as open space and associated amenities if the plant can continue operations until December 31, 2023. We completely support this extension. It will allow the property owner and the community time to reach an agreement on the ultimate use of the site, while at the same time guaranteeing much-needed open space and even providing emergency power generation for all Southern California.</p>	Please see Master Responses 2.1 and 2.2.

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715.01	My name is Nicholas Barnes and I writing as a resident of Redondo Beach to request that the power plant be closed by December 31, 2020.	Please see Master Responses 2.1 and 2.2.
715.02	<p>My wife and I have two young children who both have extra susceptibility to lung related illnesses. Our primary concern on the power plant issue is improving the quality of the air we breathe in the South Bay. Eliminating the pollution emitted from the AES plant would go a long way towards accomplishing this.</p> <p>Please close down the AES Redondo plant by December 31, 2020 so that the residents of Redondo Beach can enjoy cleaner air and improved health sooner.</p>	Please see Master Responses 2.1 and 2.5.
716.01	The coastline in Redondo is a highly cherished area in the South Bay. Preserving and enriching this area of coastline is enormously important to our residents and the overall environment.	Please see Master Responses 2.1, 2.3, and 2.5.
716.02	Attached are two photos from the power plant, one of which I took. These are from the summer of 2019, when not once, but twice the power plant had an “abnormal startup”. I can attest to the fact that not only did my phone ring off the hook, but the Cities 911 services became overwhelmed with 911 calls from the situation.	Please see Master Response 2.5.

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716.03	It is not in the best interest of the community to have this power plant in operation. We have heard many times, including now, that the power plant is needed, but then the owners talk about a sunset date in three years for the power plant. Which is it? Close the location now, there is no benefit to the community or the environment.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3 and 2.5.
716.04	The Harbor, with its rich recreational fishing and diving, as well as commercial operations would benefit tremendously from the closing of the power plant. Where is the extreme necessity to have this power plant remain open in order to sacrifice the ocean environment? One of the major reasons to close the power plant was to prevent the local fish population from being destroyed.	Please see Master Responses 2.2 and 2.3.
716.05	Not giving an extension to the power plant gives the environment that chance.	Comment noted. Please see Master Response 2.1, 2.3, and 2.5.
717.01	As a resident of Redondo Beach I would like to advise I am opposed to AES and/or other interested parties to continue operations at the Redondo Beach power plant past their December 31, 2020 deadline. Please uphold the mandated retirement deadline of December 31, 2020 in the interest of restoring the quality of California's water resources for the protection of the environment,	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.

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	public health and all beneficial uses for the benefit of present and future generations.	
718.01	Please close the Redondo Beach AES power plant as promised. My family home is right up the street from the power plant. We have experience health problems breathing issues and asthma exacerbated by the power plant pollution. I have lived in Redondo for over 22 years and did not know how much the power plant would poorly impact our lives. Our balcony it covered with a fine black power that I am sure we are breathing in regularly. We have been waiting patiently for the December 2020 closure date and expect it to be honored for our health.	Please see Master Responses 2.1 and 2.5.
719.01	I am writing to you in opposition of any extension of operation of the AES OTC power plant in Redondo Beach. The originally stated date of December 31st, 2020 should be respected by the California Water Resources Control Board.	Please see Master Responses 2.1.
719.02	There are many shoreside reasons to close this power plant. It pollutes the air everyday it operates. It operates in one of the most densely populated areas of Southern California, some residents living less that 100 feet from the AES property. The power plant is the most inefficient plant on the west coast. The power plant is a	Please see Master Responses 2.1, 2.2, and 2.5.

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	source of sight pollution, light pollution and noise pollution for tens of thousands of residents.	
719.03	But the purview of the California Water Resources Control Board is water resource quality and how it is negatively impacted by the continued operation of once through cooling power plants. The intake and outflow of the AES Redondo power plant vastly damages the marine environment in the waters off Redondo's coast. It has damaged the marine environment for decades. This is exactly why the plant is scheduled to cease operation on December 31st, 2020.	Please see Master Responses 2.1 and 2.3.
719.04	As Boardmembers please remember the duty and mission of the California Water Resources Board regarding this issue; To preserve, enhance and restore the quality of California's water resources for the protection of the environment, public health and all beneficial uses for the benefit of present and future generations.	Comment noted. Please see Master Response 2.1.
720.01	Energy reliability is critical for all of Southern California, so I am contacting you with a request to keep the AES powerplant in Redondo Beach open for the next three years.	Please see Master Responses 2.1 and 2.2.
720.02	In the U.S., the annual number of outages affecting 50,000 or more customers has risen for	Please see Master Responses 2.1 and 2.2.

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	<p>more than a decade. And while these “brownouts” are certainly an inconvenience for everyone, they also cause major economic losses. Until alternative energy production can catch up with the rising demand imposed by increasing numbers of air conditioners, computers and rechargeable gadgets, it is important to keep plants like Redondo Beach open for emergency power generation. Even though the plant operates at about 3% of its capacity, it provides a much-needed source of emergency power for all of Southern California.</p>	
720.03	<p>Not only that, but by keeping the plant open, Redondo Beach stands to get millions of dollars in funding for clean-up of the site once it does close and a guarantee that half of the site will remain open space in perpetuity. This seems like a win-win proposition – the region protects an important source of emergency power and the city gets funding and security in knowing that it will soon have 25 acres of open space.</p>	Please see Master Responses 2.1.
721.01	<p>Join me in supporting a three year extension for AES Redondo. It would enable us to turn 25 acres of the powerplant into a public open space that people will be able to enjoy.</p>	Please see Master Responses 2.1 and 2.2.

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721.02	<p>We live in a city that has far fewer parks and open space than it has, so securing land is an important part of providing that space for the future.</p> <p>Whether it turns out to be a park, sports field, or nature preserve it will improve the quality of life for residents and visitors.</p> <p>I hope you agree with me and my neighbors that open space is important and that we should just ap the chance of save this land from development. Impacts allowing a plant that has operated for more than a century to continue to operate for another 32 months pale in comparison to the permanent benefits we would realize by saving this land.</p>	Comment noted. Please see Master Responses 2.1 and 2.2.
722.01	<p>On behalf of the more than 460,000 members, including 68,000 apprentices, of the State Building and Construction Trades Council of California, including thousands that live within the coastal cities, I am writing to express our support for a three-year contract extension for the Redondo Beach Power Plant, allowing the plant to remain active until December 31, 2023.</p>	Please see Master Responses 2.1 and 2.2.
722.02	<p>As you may be aware, this facility was proudly built many decades ago by the hardworking members of the Los Angeles/Orange Counties Building</p>	Comment noted.

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	<p>Trades and after the initial build-out has been maintained by our membership in LA County. Because of our ongoing involvement in the power plant we have first-hand knowledge of its operations and have confidence that this plant can and should continue to operate safely and efficiently through 2023.</p>	
722.03	<p>Additionally, it should be noted that with the closures of Diablo Canyon and San Onofre, the Redondo Beach power production is necessary to keep Southern California powered. Closure of the Redondo Beach facility would mean that Southern California would become even more dependent on out-of-state power sources to keep the lights on in millions of homes. If we have learned anything during the COVID-19 pandemic and the resulting supply chain shortages, it should be that California should strive to be self-reliant when it is within its power to do so, and this is a clear example of when it is possible.</p>	<p>Comment noted. Please see Master Response 2.2. Additionally, as proposed in the Amendment Diablo Canyon Unit 1 and Unit 2 will be revised to reduce Unit 1 by two months and extend Unit 2 by eight months and therefore will be available to produce energy until November 2, 2024, and August 26, 2025, respectively.</p>
723.01	<p>I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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723.02	Redondo Beach’s Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in “potential impacts to marine life,” according to the 2010 Final SED.	Please see Master Response 2.3.
723.03	Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.	Please see Master Responses 2.1 and 2.4.
723.04	The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its	Please see Master Responses 2.1 and 2.4.

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	<p>restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p> <p>The staff report itself recognizes that “if the power plant’s compliance date is extended beyond December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.” (Draft Staff Report, at p. 17.)</p>	
723.05	<p>And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing. Such reports are replete with such qualifiers as "further analysis was needed," "uncertainty," and seeking "forthcoming technical studies."</p>	<p>Please see Master Response 2.2 and response to comment 001.14. Uncertainty regarding grid reliability was taken into account by the SACCWIS in its adoption of the recommendations in the January 2020 SACCWIS Report. The Amendment is based on the recommendations of the SACCWIS, which was informed by analysis conducted by the CAISO in addition to the CPUC’s IRP process and November 2019 D.19-11-016. Furthermore, the energy agencies expressed their unanimous support of the preferred recommendation of the SACCWIS in their May 2020 Joint Energy Agency Letter.</p>
723.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020,</p>	<p>Please see Master Response 2.2 and response to comment 685.01.</p>

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	<p>unemployment in L.A. County has now reached a "stunning" total of 24%. This undoubtedly has had and will continue to have a dramatic impact upon electrical needs in the commercial, retail and industrial sectors. Indeed, studies show that drops in GDP result in sharp drops in energy demand across the economy.</p>	
723.07	<p>On May 12, 2020, the California Energy Commission released a report showing that the average weekday demand for electricity declined by more than 4% from the previous year in late March 2020 and by more than 9% compared to the recent year in April 2020. Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur. And the need for park and open spaces is more critical than ever in a post-COVID world.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2. Please also see response to comment 685.01.</p>
723.08	<p>The AES proposal to extend the life of the Redondo Beach plant for another three years is blissfully dismissive of this obsolete plant's harmful effects on marine and estuarine life. In the wake of the pandemic, even the proposed one-year</p>	<p>Please see Master Responses 2.2, 2.3, and 2.5.</p>

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	extension cannot be justified for environmental, health or economic needs.	
724.01	Please compare the cost of paying these plants for standby services vs incentivizing homeowners to add solar and backup batteries, and improving our grid to take advantage of it. Paying these plants to remain on standby will be costly. This is lost money, like renting a home instead of buying.	Please see Master Responses 2.1 and 2.2.
724.02	<p>It would be a better use of this money to incentivize homeowners to add solar and battery backup.</p> <p>Battery storage is faster response than a gas power plant and has proven very effective and even profitable.</p> <p>Small projects at many houses can come online very quickly.</p> <p>Battery backup lasts many years; a year or three of payment to be on standby is lost money.</p> <p>Given the state of the economy, many small projects will quickly stimulate the economy and many jobs, vs payments to a power company for standby service. Additionally, we can start new contracts to tear down the plants now. This is</p>	<p>Comment noted. Please see Master Responses 2.1, 2.2, and 2.5. The CPUC considered many options in the development of recommendations and directives in D.19-11-016. It is unclear if enough MW of small-scale, behind the meter solar and battery backup would come online quickly enough to help mitigate the 2,300 MW to 4,400 MW estimated system-wide electrical shortfall starting in summer of 2021.</p>

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	<p>payments for new jobs vs standby payments. This is a time to be building new infrastructure.</p> <p>Cost of money is very low. If the budget for standby payments is not enough to buy significant battery power, augment it with loans.</p> <p>Battery systems causes no pollution. These plants are polluters. Coronavirus is more harmful when people have underlying complications; air pollution will worsen these symptoms. This is a bad time to be putting more pollutants in the air.</p>	
725.01	<p>We NEED you to protect marine life along our California coast by not extending the ocean water cooling deadline at Redondo Beach, Alamitos, and Huntington Beach past December 31, 2020, as scheduled ten years ago.</p>	<p>Comment noted. Please see Master Responses 2.2 and 2.3.</p>
725.02	<p>The Alamitos (Long Beach) and Huntington Beach facilities have largely been replaced already. Three of six units at Alamitos, have already been taken offline. At Huntington Beach three of four have been decommissioned. The Redondo Beach facility is too antiquated to be useful for emergency use and operated at just 2% of its full capacity, in 2018. With the recent news that SoCal Edison has 770 megawatts of new battery storage coming</p>	<p>Please see Master Response 2.2. Additionally, see revisions in Section 5.2 of the Staff Report regarding peaker facility operations and their role in grid reliability.</p>

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	online by August 1, 2021, the need for these plants for grid reliability will be even further reduced.	
725.03	Besides the damage to marine life, these plants damage public health and contribute to climate change. As a South Bay resident I am especially concerned, for myself, my family and my neighbors. We need a just transition away from fossil fuels and that should begin by replacing these polluting power plants with power from renewable sources.	Comment noted. Please see Master Responses 2.1, 2.2, and 2.5.
726.01	We understand that the SWRCB is proposing to amend its OTC policy to extend the compliance dates of four power plants scheduled to retire on December 31, 2020. NCPA supports an extension for the four plants, but believes a full three-year extension should be afforded to each of the four plants in question: Alamitos Generating Station, Huntington Beach Generating Station, Ormond Beach Generating Station, and Redondo Beach Generating Station.	Comment noted. Please see Master Responses 2.1 and 2.2.
726.02	For nearly two years, the California Independent System Operator (CAISO) has been raising concerns about potential grid reliability issues occurring in Southern California beginning in 2021, driven by the rapid deployment of solar generation in California combined with the retirement of four	Please see Master Response 2.2.

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	<p>natural gas-fired generating plants on December 31, 2020: Alamitos Generating Station, Huntington Beach Generating Station, Ormond Beach Generating Station, and Redondo Beach Generating Station. In this proceeding, the Statewide Advisory Committee on Cooling Intake Water Structures (SACCWIS) developed a series of recommendations to address this issue, offering several alternatives for the SWRCB to consider as it updates its OTC policy.</p>	
726.03	<p>Given the situation regarding COVID-19 and the impacts the pandemic is having on the California economy and consumers, NPCA supports SACCWIS Alternative 2, which proposes to extend the OTC Policy Compliance dates for each of the four power plants until the end of 2023. This alternative would extend the OTC policy Compliance dates for all power plants for a period of three years. As noted in its final recommendation, SACCWIS notes that this option would “maximize the buffer of available capacity if there are delays in the new procurement, at least through the end of 2023.” This point is critically important, especially in light of COVID-19, and the long-term impacts the pandemic will have on future power generation in California.</p>	Please see Master Responses 2.1 and 2.2.

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	<p>A key factor not considered in the recommendation is the impact that the COVID-19 pandemic will have on the range of multiple renewable and storage projects that are critical to protecting grid reliability. While the full effects of the COVID-19 pandemic are not fully known at this time, NCPA has great concern that renewable and storage project delays should be expected around the State and the Southwest as the financial impacts of COVID-10 delay construction activities and impact foreign supply chains.</p>	
726.04	<p>NCPA is not alone with this concern. Concerns about COVID-19 and the financial impacts it will have on the power sector is well documented and growing as the full impact of COVID-19 takes charge. Consider the following, first from the largest investor-owned utility operating in the region impacted by the OTC policy:</p> <p>SCE’s ability “to operate its business, fund capital expenditures, and implement its business strategy is dependent upon its cash flow and access to the bank and capital markets. <u>The COVID-19 pandemic may cause restricted access to, or increased costs of accessing, bank and capital markets.</u> As a precaution, in March and April 2020, SCE brought forward debt issuances that had been planned for later in the year to provide</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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	additional financing flexibility given possible future market uncertainty.” (SCE Form 10-Q Filing, Dated 3/30/2020, Emphasis Added)	
726.05	Tesla, a major player in the deployment of solar and storage, has expressed concern about COVID-19 and its impact on manufacturing. In particular, “the specific timing and pace of our resumption of normal U.S. manufacturing operations will depend on the status of various government regulations and the readiness of our suppliers, vendors and currently inactive production workforce. <u>Although we are working with each of our suppliers and government agencies on how best to resume and sustain production, it ultimately remains uncertain how quickly we and our suppliers will be able to return to prior levels of production and maintain such levels.</u> ” (Tesla Form 10-Q Filing, Dated 3/30/2020, Emphasis Added)	Comment noted. Please see Master Response 2.2.
726.06	The Federal Energy Regulatory Commission (FERC), the agency responsible for ensuring the reliability of the nation’s bulk power system, which includes the Los Angeles Basin, recently announced that it will be holding a technical conference to assess the long-term impacts of COVID-19 on the power sector. FERC Chairman Chatterjee indicated that “we must ensure the	Comment noted. Please see Master Response 2.2. Please also see response to comment 685.01. Financial market dynamics are outside the scope of this Amendment and the authority of the State Water Board. The State Water Board, in considering revisions to the compliance schedule set forth in the OTC Policy, seeks to implement the requirements of Section

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	<p>American people continue to have access to reliable and affordable energy. While the details of the conference have not been detailed, the financial implications of COVID-19 is likely to be the focus of discussion.</p> <p>Finally, the rating agencies that assess industry risk are increasingly concerned about the public finance sector in a COVID-19 environment. As recently noted by Stanford and Poor's, "we view this sector- municipal water, sewer, electric, and gas utilities- as increasingly vulnerable to the potential economic effects of the pandemic. Although we expect that the essential nature of these utility services will support significant demand for these services, we nevertheless believe that the widespread shuttering of commercial establishments and factories will remove a component of sales, exposing utilities' cash flows and liquidity to potentially meaningful declines if shutdowns persists." (S&P Global Ratings, 4/1/20)</p>	<p>316(b) and other applicable CWA provisions while ensuring reliability of California's electric system.</p>
726.07	<p>We can all agree that the full impact of COVID-19 has yet to fully materialize, but the recommendation being considered by the Board did not account for the uncertainties of COVID-19. To NCPA, a cautious path is needed by the SWRCB as it relates to OTC policy. It is absolutely</p>	<p>Comment noted. Please see Master Response 2.2.</p>

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	critical that any change in the OTC policy not potentially compromise reliability in California, which could further jeopardize the ability of the state to recover from a pandemic that will impact California well beyond the length of the OTC policy extension.	
727.01	As a resident in the immediately adjacent city of Hermosa Beach and governing board member of the Hermosa Beach City School District, I implore you to vote “no” on the proposed extension.	Please see Master Response 2.1 and 2.2.
727.02	The AES Power Plant is a grave concern in our community due to its harmful effect on our environmental health and quality of life. The plant and its acres of radiating power transmission lines have been highly visible sources of noise, visual and air pollutions for not only the 21,000+ people living in a mile of the plant in both Redondo Beach and Hermosa Beach, but the wider South Bay region. Key factors to note are that the aged natural gas plant is the leading contributor of fine particulate matter pollution in the area and second, only to transportation, in emissions of nitrogen oxides.	Please see Master Responses 2.3 and 2.5.
727.03	In addition the Once-Through Cooling system is harmful to the South Bay’s marine ecosystem. This could put funding for parkland and wetland	Comment noted. Please see Master Responses 2.1, 2.3 and 2.4.

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	restoration in jeopardy. As we look to the future, there are even economic opportunities with possible inclusion of the area in the Los Angeles Olympics in 2028, with the waterfront being considered for water polo, open swimming, boating events, festivities, cultural events or training facilities.	
727.04	Please consider rejecting the extension and allow these 50 acres to become a source of pride and boon to the region's health and quality of life.	Please see Master Response 2.1.
728.01	It is important for us to take advantage of every opportunity we can to protect open space and preserve it so that nothing is ever built on it. By supporting a three-year extension of operations at the AES powerplant in Redondo Beach, you will enable our community to save 25 acres of open space in perpetuity. This looks like a "Win-Win" for everyone involved if negotiated properly, with time constraints/performance bonds and commits the new owner to agreed upon obligations and holds him accountable to completion.	Please see Master Responses 2.1.
728.02	While the plant is scheduled to cease operations at the end of 2020, the new owner has provided an enticing community benefits package if the plant is allowed to operate through 2023. In exchange for the extension, he is willing to guarantee that nearly	Please see Master Response 2.1.

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	half of the site will be protected as open space in perpetuity and it will provide millions of dollars to start early clean up of the site and the process of removing the overhead power lines.	
728.03	We have waited/wasted years and years to resolve this fiasco; what's another three years? Besides, the extra three years provides the extra funding needed to get things accomplished that would otherwise have to wait and may not even wind up happening! Get this new owner committed in writing and hold him accountable, including timelines, to do what he has committed to do.	Please see Master Response 2.1.
728.04	It is critical that the Water Board vote to support this extension because it is the only way we can guarantee that this land will be protected.	Please see Master Responses 2.1.
729.01	I fully support your 2010 ruling that coastal power plants utilizing ocean water for Once Through Cooling (OTC) processes cease those operations by 1/1/2021. The plant is not needed to meet the excess electricity capacity at the expense of smoke discharged into my neighborhood.	Please see Master Responses 2.1, 2.2 and 2.5. Additionally, the compliance date for Redondo Beach is December 31, 2020, and is proposed to be extended to December 31, 2021 to address grid reliability.
730.01	We have a new owner now and with this new owner comes a practical plan to retiring this power plant. With a 3-year extension, our community will have a set plan to expediting the remediation and	Please see Master Response 2.1.

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	<p>redevelopment of the site, along with the assurance of up to 25 acres of open space that the City can have for the benefit of our community. As someone who lives right next to the site, it would be absolutely devastating to fight for an immediate closure of the plant without A SET plan to redeveloping and assuring public land for our community.</p> <p>Right now, we have the opportunity to get an agreement to maximize the public benefit and assure that the closure and the tear down of the power plant will have an actual identified date...unlike the alternative of pushing for the power plant to close next year, without any assurances of how we will transition that site.</p>	
730.02	Please vote to support the extension ... three more years of operation at a plant that has operated in our community for more than 120 years is a small price to pay for a concrete plan of remediation and protecting 25 acres of land as open space forever.	Please see Master Response 2.1.
731.01	With reference to the coastal site in Redondo Beach, CA, where a power plant operated by AES is located, I now understand the de-commissioning of the power plant is under review, I would like to voice my strong opposition to any change which	Please see Master Responses 2.1 and 2.2. To clarify, the OTC Policy amendment proposes extending the compliance date for Redondo Beach by one year to December 31, 2021. Considerations on how the plant may be

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	allows the power plant to remain in existence and functionality.	decommissioned in the future are outside the jurisdiction of the State Water Board.
731.02	As a resident of Redondo Beach for over 30 years, it is time to remove this unnecessary, antiquated and polluting eyesore from the landscape and to allow a responsible return of the property to it's natural state for the use and enjoyment of all.	Comment noted. Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
731.03	We have waited long enough for this to happen and AES has had ample time to make arrangements to comply with the order as detailed by the Board a decade ago. To change this directive at this time would be an egregious error that goes against the will of the people and the trust we have in your word and actions. Please do not let this happen and deny AES and their lobbyists attempt to extend the operation of the power plant beyond December 31, 2020.	Comment noted. Please see Master Responses 2.1 and 2.2.
732.01	There are approximately 4,700 students attending schools in my district, as well as almost 14,000 residents, some of whom reside in boats in our harbor. Redondo Beach is the second most densely populated coastal city in California. When people visit our city from around the world, they stay in District 2's hotels, eat at our restaurants, and visit our famous Redondo Pier.	Please see Master Responses 2.1, 2.5, and 2.6.

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	<p>As the representative of our area, I know that nearly every resident wants this plant shut down on December 31 of this year as promised for the last decade. Residents are frequently startled or woken up in the middle of the night by jet-engine-decibel-level noise from the plant's pressure relief system, which clearly exceeds all local noise ordinances.</p> <p>Our residents are directly impacted by the plant's emissions, suffering the effects of the deadly gasses and particulate emitted from the plant's stacks. The smoke stacks tower 150 feet in height, which is the level at which Beryl Heights Elementary sits at the top of a hill, bringing deadly particulate matter into the lungs of otherwise healthy kindergartners through 5th graders, many of whom play outside on the school's playground and ball field. The middle school and high school have physical education classes outdoors all day long, and there are a number of asthmatic students that are affected by the poor air quality. The plant's emissions wreak havoc on their already compromised lungs during outdoor sports practice at our schools.</p> <p>We also have two assisted living care facilities, with primarily elderly residents suffering memory loss, Alzheimer's, and additional comorbidities,</p>	

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	<p>such as diabetes, heart disease, and COPD. We have several other independent senior living facilities, such as the Salvation Army Mindeman Senior Residence Center (Meals on Wheels), within a short walk from the power plant. Finally, inland residents from the LA Basin, who suffer some of the worst air quality in the country, visit Redondo with their families to spend the day at the beach or our most visited park, the Seaside Lagoon. They come to Redondo to enjoy fresh air along the coast, unaware that the emissions from the power plant just across the street could be filling their lungs with poisonous gas and 2.5-micron particulate matter, which has been scientifically proven to cause heart disease, stroke, and other cardiopulmonary illness.</p>	
732.02	<p>Our city's waterfront has been blighted for over 100 years. This affects not only the surrounding property values, but also the desirability of Redondo Beach as a tourist destination. The Southern California Edison Right of Way, which leads down to the power plant, is a visual eyesore. With the closing of the power plant, we can set about with the removal of the power lines and towers to create a greenbelt where people can walk or bike down to the waterfront.</p>	<p>Comment noted. Please see Master Responses 2.1.</p>

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732.03	The area adjacent to the plant has been identified by environmental groups as being the habitat of protected species, including the burrowing owl.	Comment noted. Please see Master Response 2.4 and 2.6.
732.04	The city is in negotiations to acquire this land currently used for power lines from the plant, to convert to public open space and parkland. The city has made significant progress in securing state funding for the acquisition of the open space resulting from the plant's retirement to serve our park-poor city. State voters passed Prop 68 in 2018, not to extend the life of this once-through-cooling power plant, but to convert it to parkland.	Comment noted. Please see Master Response 2.1 and 2.4. Please also see revisions in Sections 5.3 and 5.5 of the Staff Report with updated information on the wetlands at Redondo Beach and the retention of Prop 68 funding by the City of Redondo Beach. To clarify, amendment of compliance dates of facilities under the OTC Policy is within the jurisdiction of the State Water Board and is outside the jurisdiction of the California Natural Resources Agency, which is a distributor of Prop 68 grant funding.
732.05	As the elected representative from our district, I ask that you do not extend the AES Redondo power plant closing date past December 31, 2020.	Please see Master Responses 2.1 and 2.2.
733.01	As a past city council member of the City of Torrance, I am writing to express my support of a three-year extension of operations for the Redondo Beach power plant.	Please see Master Responses 2.1 and 2.2.
733.02	I think we need a solution that will provide South Bay residents with the quickest avenue to demolishing and redeveloping this site in a way	Please see Master Response 2.1.

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	<p>that will benefit the South Bay. Denying a three-year extension of the plant operations will not eliminate the facility any sooner – the plant and the power lines will continue to remain in place for the next three years regardless of whether the plant remains in operation or not.</p>	
733.03	<p>AES and the new owner of the property have committed to an irrevocable benefits package that would help accelerate the transition of the site to non-industrial use and ensure that approximately half the property is reserved for public open space and related amenities.</p>	Please see Master Response 2.1.
733.04	<p>Extending the operation of the plant through 2023 would:</p> <p>Preserve 5 to 6 acres of land assumed to be wetlands at the site.</p> <p>Permanently reserve about half of the 51-acre site for public open space and related amenities.</p> <p>Create a \$14 million fund to be used exclusively for open-space planning, the engineering and planning expenses of removing the transmission lines and other cleanup activities.</p>	Please see Master Response 2.1.

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	<p>Provide the City of Redondo Beach with an option to use its grant money and other funding sources to purchase up to 15 acres of the open space.</p> <p>Guarantee a permanent plant retirement date of December 31, 2023 that cannot be extended without the consent of both the City of Redondo Beach and the new property owner.</p>	
734.01	I know that the decisions you make are difficult and it is often hard to determine what is the right path for the community. In this case, however, I believe there is only one position that truly serves the residents of Redondo Beach, and that is to extend the operations of the AES power plant for an additional three years.	Please see Master Responses 2.1 and 2.2.
734.02	A three-year extension enables an attractive community benefits package that will accelerate the redevelopment of the site to non-industrial use;	Please see Master Response 2.1.
734.03	Keeping the Redondo Beach power plant available through 2023 provides a valuable insurance policy to provide emergency energy during times when the power grid is stressed;	Please see Master Response 2.2.
734.04	Because of AES’s early actions regarding environmental protections, an extension of	Please see Master Responses 2.1, 2.2, 2.3, 2.4, and 2.5. Additionally, it is unclear what early environmental actions the commenter is referring to. Furthermore, if Redondo Beach is

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	operations in Redondo Beach through 2023 will have negligible environmental impacts.	extended, AES will be required to continue fulfilling the interim mitigation requirements until final compliance with the OTC Policy.
734.05	<p>AES and the new owner of the property have committed to an irrevocable benefits package that would:</p> <p>Reserve about half of the 51-acre site for public open space and related amenities forever.</p> <p>Allow the City of Redondo Beach an option to use its grant money and other funding sources to purchase up to 15 acres of the open space.</p> <p>Give \$14 million in funding from AES for cleanup activities and the engineering needed to remove the overhead powerlines.</p> <p>Set a permanent plant retirement date of 12/31/2023 that cannot be extended without city approval.</p>	Please see Master Response 2.1.
735.01	Attached herewith, please find my written comments regarding the serious health concerns to our community, from the continued operation of the AES Redondo Beach power plant.	Comment noted. Please see Master Responses 2.1, 2.3, and 2.5.

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	<ul style="list-style-type: none"> • Ton’s of Poisonous Emissions Annually (CO, NOx, PM, Ammonia etc.) <ul style="list-style-type: none"> ○ concentrated on hot (peak load) days <ul style="list-style-type: none"> ▪ coincides with peak human outdoor recreation activities • AES Redondo Beach is in highly densely populated area <ul style="list-style-type: none"> ○ 11,000-13,000 people per square mile <ul style="list-style-type: none"> ▪ 4000% higher than California average (12,000% higher than national average) • Affects 25,000+ residents in a 1 miles radius across Redondo Beach, Hermosa Beach and Torrance (vs 17 residents around Ormond Beach) • Redondo Beach 1950’s era plant is least efficient of coastal plants being considered for extension <ul style="list-style-type: none"> ○ Higher pollution effects vs. others ○ Higher marine life effects vs. others 	

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	<ul style="list-style-type: none"> • COVID-19 Air Pollution Comorbidity • 20 Outdoor Park/Recreation Areas in Close Proximity • Coastal Recreation & Leisure Areas in Close Proximity <ul style="list-style-type: none"> ○ 2 miles of outdoor Beach areas ○ Seaside Lagoon (80,000 visitors annually, mainly during hot summer) ○ Redondo Beach Pier – National Vacation Destination ○ Marina ○ Hotels, shops, restaurants • 9 Schools Within 1 Mile of AES Redondo Beach • 20 Schools Within 2 Miles of AES Redondo Beach • 8+ Senior Living Facilities with 1-2 miles 	

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	<ul style="list-style-type: none"> ○ Salvation Army Mindeman Senior Residence directly adjacent <ul style="list-style-type: none"> ▪ 100 senior residents live next door to AES plant 	
736.01	<p>The recent news of the long promised shut down of the power plant December 31, 2020 is in jeopardy is disturbing. As California native, also Southbay resident of Redondo Beach for over 30 years. I live in close proximity to the power plant and I can tell you of countless stories of shrieking overpressure releases at all times of day and especially middle of the night 3rd shift. The belching of coal black smoke upon start-up reminds me of times past as industry ruined our environment with world famous smog. Recent times they seem to start-up at night as to mask the pollution they admit. The particulates the plant emits aren't just microscopic, we live with the fallout everytime it runs. I personally have to waste fresh water to power wash our outdoor living areas constantly to rid the grey residue from surfaces.</p>	<p>Comment noted. Please see Master Response 2.5. Additionally, please see revisions in Section 5.6 of the Staff Report for supplemental information regarding air permit compliance for Redondo Beach.</p>
736.02	<p>I implore you to continue with the original restriction to end once through cooling of this power plant. If its not feasible for the owners of the</p>	<p>Please see Master Responses 2.1 and 2.2.</p>

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	power plant to modify the plant then it should shutter.	
736.03	State agencies have already ruled that the power plant is not needed for grid stability as it only runs less than 5% of capacity. Also a major polluter in the County of Los Angeles.	Comment noted. Please see Master Responses 2.2, 2.3, and 2.5.
737.01	The power plant needs to be shut down ASAP.I can see the black smoke emitting into the air, thereby, sending contaminants for the residents to inhale; the noise is another issue.	Comment noted. Please see Master Responses 2.2 and 2.5.
737.02	Using ocean water for cooling the turbines sends warm water back into the ocean which negatively effects sea life.	Please see Master Response 2.3.
737.03	It is my understanding that this plant is really not needed. Please do not extend its permit.	Please see Master Response 2.2.
738.01	On behalf of millions of young men and women in the greater Los Angeles area looking for a second chance through the ARMS Organization, I am writing to express our support for a three-year contract extension for the Redondo Beach power plant, allowing the plant to remain active until December 31, 2023.	Please see Master Responses 2.1 and 2.2.
738.02	Adolescent Rescue Mentoring Solutions has worked ceaselessly over the past six years in side-	Comment noted.

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	<p>by-side solidarity with the Building Trades, and we are proud to stand strong with them once again. What is a priority to skilled labor, by virtue of their support and enthusiasm to see a better Los Angeles for young Angelenos, is a priority to ARMS.</p>	
738.03	<p>California energy agencies acknowledge that the Redondo Beach plant should remain in operation due to the state’s energy resource adequacy shortfall. Even more troubling is what we’re seeing on the frontlines and the slowdown of the supply chain and approval processes due to COVID-19. With the current and foreseeable delays on solar power and storage projects that were expected to come on-line to support our energy demands, we are facing an extremely uncertain time in the power market.</p> <p>A three-year extension will provide an assurance that the surrounding area will be spared from potential blackouts during the hottest summer months to come, as well as the impacts we are seeing due to COVID- 19.</p> <p>ARMS believes it isn’t good enough to simply talk about doing something for the community, only to miss out on a golden opportunity to employ people. Let’s not make that mistake here. Energy</p>	Please see Master Responses 2.1 and 2.2.

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	<p>work is a model industry, providing quality, long-term careers for young men and women who are simply looking to be healthy, productive, self-sustaining members of our society. Given the unprecedented challenges we have experienced with the Grid the last several years, we need all available energy options for our workforce to do their jobs effectively and strongly urge you to support a three-year extension for the Redondo Beach plant.</p>	
739.01	<p>We respectfully write to express our vehement opposition of operations at the AES Redondo Beach power plant located at 1100 North Harbor Drive in Redondo Beach. This extension was recommended for your consideration by the California Public Utilities Commission at their November 7, 2019 meeting and we formally request that the State Water Resource Control Board vote no on this proposed extension.</p>	<p>Comment noted. Please see Master Response 2.1 and 2.2. Please see Section 5.1 of the Staff Report for a description of the SACCWIS process, and the analysis of the energy agencies, that led to the SACCWIS recommendation on January 23, 2020 and informed the Amendment.</p>
739.02	<p>The cities of Redondo Beach and Hermosa Beach have been working diligently for many years to ensure this facility cease its operations and transition the site to a more beneficial use. Redondo Beach has spearheaded these efforts and the City of Hermosa Beach has worked closely with Redondo Beach toward the same goals. The plant and its acres of radiating power</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5. Additionally, please see revisions in Section 5.6 of the Staff Report for supplemental information regarding permit compliance for Redondo Beach.</p>

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	<p>transmission lines have been highly visible sources of noise, visual and air pollution for not only our cities but the region as a whole. Redondo Beach Unified School District has three schools in close proximity to the plant (Beryl Heights Elementary, with 459 students, Jefferson Elementary, with 580 students, and Redondo Union High School, with 3029 students), whose students are exposed to pollution from the plant.</p>	
739.03	<p>The tireless efforts of the City of Redondo Beach have been vital in finally bringing the imminent closure of this locus of blight. Currently, the facility is scheduled to close at the end of 2020- only a few short months from now. In addition, a private party has purchased the property with the aim of redevelopment. The City of Redondo Beach has additionally been awarded a State grant of nearly \$5 million to purchase portions of the land to become open park space and established a Enhanced Infrastructure Financing District to benefit the site's future development. We request that you oppose this extension of operation of AES Redondo Beach and allow these 50 acres to finally become a source of pride and boon to the region's health and quality of life.</p>	Please see Master Response 2.1.
740.01	<p>On behalf of the entire Hermosa Beach City School Board in the City of Hermosa Beach, we</p>	Please see Master Response 2,2 and response to comment 739.01. Please see Section 5.1 of

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	<p>wanted to add to the voices of opposition to the proposed extension of operations at the AES Redondo Beach power plant located at 1100 North Harbor Drive in Redondo Beach. This extension was recommended for your consideration by the California Public Utilities Commission at their November 7, 2019 meeting and we formally request that the State Water Resource Control Board vote no on this proposed extension.</p>	<p>the Staff Report for a description of the SACCWIS process, and the analysis of the energy agencies, that led to the SACCWIS recommendation on January 23, 2020 and informed the Amendment.</p>
740.02	<p>As the intimate neighbor of Redondo Beach, we see this power plant as part of our day to day life in Hermosa Beach. We were encouraged when the facility was going to cease its operations and transition the site to a use that would align with the beach cities missions and visions. As you know, the site is located across the street from the southern tip of Hermosa Beach. Its continued operation and existence impacts the lives of our children and their families, as well as the families in Redondo. The environmental impact of air pollution and radiating power transmission see no boundaries and the long term effects of this extension are what compels us to write. Our children deserve better, their health matters, and it is our responsibility as adults to look out for this population in our decision making.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.5.</p>

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740.03	As we understood the agreement was to close the facility at the end of 2020. With the promise of the area's development, the fragile environment we are already leaving for our kids, and the long decision-making process that landed the State Water Resources Control Board at, closure at the end of 2020, we strongly encourage you to reconsider your extension of operations for the AES Redondo Beach power plant and vote no.	Comment noted. Please see Master Responses 2.1 and 2.2.
741.01	I am writing to support AES and its new owner of the Redondo Beach Power Plant, and request that the 3 year extension be granted.	Please see Master Responses 2.1 and 2.2.
741.02	AES has always been a rather charitable and kind neighbor, until the relatively recent attempts by the city to force them to give/"donate" their property.	Comment noted. Please see Master Response 2.1.
741.03	I only learned of this request because of Councilman Horvath's Next Door post requesting letters AGAINST it. Please do what is right for California, not a self-serving city.	Comment noted. Please see Master Response 2.1.
742.01	On behalf of Merced Irrigation District (MID), I am writing to support three-year extensions for the Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach once-through cooling (OTC) power plants. Extending all four plants for three years will maximize reliability and operational	Please see Master Responses 2.1 and 2.2.

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	<p>flexibility of the electricity grid and minimize ratepayer costs, amid a period of economic turmoil, without jeopardizing compliance with the state’s required water flow reductions under its OTC policy.</p>	
742.02	<p>California needs power plant capacity. In order to maintain grid reliability, the California Public Utilities Commission has ordered load-serving entities to procure new resources in Southern California on an ambitious schedule. The COVID-19 crisis threatens all economic activity, including this required deployment of new, preferred resources. Wildfires and Public Safety Power Shutoffs also promise to continue posing significant challenges to the electricity grid in the coming years.</p> <p>MID recently contracted with the Redondo Beach plant for three years of OTC-contingent resource adequacy. This plant will help us maintain grid reliability at low cost to our customers. If the Water Board does not extend the Redondo Beach plant for up to three years, we will have to find other resources to fulfill our resource adequacy obligations, at higher costs and from entities able to exert greater market power in a tight market.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.2. Additionally, please see response to comment 001.10.</p>

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742.03	In addition to mitigating risks and maximizing operational flexibility on the electricity grid, extending all plants for three years will increase competition in the capacity market, limiting market power for any individual entity, and minimizing costs for our ratepayers and those across the state. Already, demand is high for OTC-contingent resource adequacy, suggesting costs could increase if the state limits competition. The Water Board doesn't need to pick and choose among power plants – it should let the market do that.	Comment noted. Please see Master Responses 2.1 and 2.2. Determination of which power plants LSE's contract with for RA capacity is outside the authority of the State Water Board.
743.01	I write to urge the State Water Board to grant no compliance date extensions beyond the December 31, 2020 deadline for Redondo Beach Units 5, 6 and 8, thereby requiring all power generating units to be permanently retired at the time, as envisioned in the OTC Policy a decade ago.	Comment noted. Please see Master Responses 2.1 and 2.2.
743.02	Redondo Beach's Units 5 and 6 are the oldest, and least energy efficient of all the OTC power plant facilities being considered by the Board in conjunction with the July 21, 2020 hearing. Unit 5 was built in 1954 and Unit 6 in 1957. As has been noted, these steam boilers require more OTC intake water to produce a megawatt-hour than any of the other power plants, thereby resulting in	Please see Master Responses 2.3.

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	<p>“potential impacts to marine life,” according to the 2010 Final SED.</p>	
743.03	<p>Equally significantly, the City of Redondo Beach has been working with the County of Los Angeles, its neighboring Beach Cities, and city, regional and state officials, as well as the California State Coastal Conservancy to acquire and develop a substantial part of the 51-acre power plant site for wetland restoration and as a regional or state public park. The heavily populated areas surrounding the Redondo Beach facility are among the most densely populated coastal areas along the entire California coast.</p>	<p>Comment noted. Please see Master Responses 2.1 and 2.4.</p>
743.04	<p>The California Coastal Commission has reaffirmed that the Redondo Beach plant is located on the historic Old Redondo Salt Lake wetlands, a saline, spring-fed lagoon that was used for salt production, first by Native Americans and then in the late 1800s by the Pacific Salt Works. Its restoration is critically needed to improve ocean water quality, protect marine life and provide needed habitat for migrating birds.</p> <p>The staff report itself recognizes that “if the power plant’s compliance date is extended beyond</p>	<p>Comment noted. Please see Master Responses 2.4.</p>

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	December 31, 2020, this grant funding [to acquire the parkland] is potentially in jeopardy.”	
743.05	And the Public Utilities Commission concedes that its concerns regarding electric grid reliability beginning in the summer of 2021 are speculative, and are substantially alleviated by the expected extensions involving the other plants under consideration for the July 21, 2020 hearing.	Please see Master Response 2.2.
743.06	<p>Finally, all of the energy projections were conducted before the COVID-19 crisis and the drastic slowdown in our state’s economy due to the stay-at-home directives. As of May 11, 2020, unemployment in L.A. County has now reached a "stunning" total of 24%.</p> <p>Under these circumstances, and given the fact that there only will be a gradual opening under the best of circumstances, the worst-case scenarios regarding potential power shortfalls in mid to late 2021 have become even more unlikely to occur.</p>	Please see Master Responses 2.1 and 2.2.
743.07	Thank you for this opportunity to address my concerns against extending the longstanding OTC compliance deadline for the Redondo Beach Generating Station beyond the end of this year. Units 5, 6 and 8 are richly reserving of retirement	Please see Master Responses 2.1 and 2.2.

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	to allow the park and restoration plans to proceed apace.	
744.01	I am writing to indicate that California Choice Energy Authority (“CalChoice”) has agreed to contract with the Redondo Beach once-through cooling (“OTC”) power plant to support the CalChoice Members’ resource adequacy procurement obligations. Without an OTC extension for this resource, short-term resource adequacy supply will decrease which may adversely impact electricity prices for the CalChoice Member rate payers as well as for all of California ratepayers due to the tightening of the short-term resource adequacy market.	Comment noted. Please see Master Response 2.2 and response to comment 001.10.
744.02	CalChoice and its Members support the California Public Utilities Commission (“CPUC”) and the California Independent System Operator’s (“CAISO”) proposal to delay the retirement of several OTC resources through CPUC Decision 19-11-016. In addition to mitigating risks and maximizing operational flexibility on the electricity grid, extending the OTC resources as proposed will increase competition in the capacity market, limiting market power for an individual entity, and minimizing costs for ratepayers across the state. The extension of the OTC resources should also limit CAISO backstop procurement through the	Comment noted. Please see Master Response 2.2.

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	next few years, leading up to the deployment of 3300 MW of incremental capacity by August 2023 per CPUC Decision 19-11-016.	
744.03	CalChoice and its Members support the state’s transition away from OTC resources and toward cleaner energy choices. However, now is not the time to limit short-term resource adequacy resources or unnecessarily increase ratepayer costs. The Water Board can take an important step to support grid reliability, market competition and lower ratepayer costs without threatening its environmental priorities by extending the Alamitos, Huntington Beach, Ormond Beach, and Redondo Beach OTC resources as proposed by the CPUC and CAISO in Decision 19-11-016.	Comment noted. Please see Master Response 2.2.
745.01	I want to strongly encourage you to NOT EXTEND the retirement plan for the AES power plant in Redondo Beach beyond the December 2020 date. The idea of a huge, dirty, inefficient, and rarely used plant operating the heart of a touristy beach-side suburb for one day longer than necessary is ludicrous.	Comment noted. Please see Master Responses 2.1 and 2.2.
745.02	Studies have demonstrated it is NOT needed to provide power; other newer and more efficient plants have been shown to be able to cover for it.	Please see Master Response 2.2.

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745.03	The thing is an EYESORE, an unnecessary blight on the community that is LONG OVERDUE for retirement and demolition. On the rare occasions it is fired up these days, it farts and belches black smoke that is clearly NOT up to environmental standards -- the rest of the time it just sits there taking up space, ugly & decaying & unneeded.	Please see Master Responses 2.1, 2.2, 2.3, and 2.5.
746.01	I am writing to inform the Water Board that San Jose Clean Energy, has entered into an agreement with AES Redondo Beach, LLC for the purchase of resource adequacy capacity from the Redondo Beach Generating Station to support San Jose Clean Energy's resource adequacy requirements. Without an OTC extension for this resource, resource adequacy supply will decrease in California which may adversely impact electricity rates for our customers.	Comment noted. Please see Master Response 2.2 and response to comment 001.10.
747.01	I do support the extension of the power plant operation.	Comment noted.
747.02	I favor the State Water Resources Control Board upholding the Will of the People and allow the power plant to continue to operate as a utility, until the Redondo Beach voters rezone the site for non-utility purposes. If the Redondo Beach voters no longer want the power plant to operate as a utility, changing what the site is currently zoned for, then	Comment noted. Please see Master Responses 2.1.

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	the change to the Redondo Beach City Charter should go to the vote of the people. Overturning, settled provisions put forth in Measure G should be put on the ballot.	