

May 29, 2018

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

To whom it may concern:

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

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

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

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

As such, the City respectfully encourages West Basin to support the prioritization of different technologies that focus on conservation and use of recycled water. The City understands that desalination technology could be a viable solution to water supply in the future. However, at the present time, the City is particularly concerned with the intense energy consumption of the project, the unknown and overriding financial costs, and the impact to local marine life. It is our opinion that alternative technologies such as water reclamation, recycling, stormwater capture, infiltration, and conservation have not been fully exhausted.

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

Thank you for your consideration.

Sincerely,

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

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

1. To the extent feasible Culver City supports further expansion of recycled water use in the West Basin as an alternative to desalinization. This would offset the use of potable water and therefore act as a virtual new water supply and would further reduce the amount of treated sewage that Hyperion is releasing to Santa Monica Bay. We understand that up to 150 MGD of discharge from Hyperion is still potentially available for this purpose. Culver City has over 100 acres of parks that would benefit from an expanded recycled water supply and distribution system. In addition, the potential for use of recycled water by the industrial and commercial sectors of Culver City should be explored.
2. We are concerned with the cost of desalinization when compared with other alternatives such as expanding recycled water production. We are especially concerned that detailed economic analysis of the construction and operating costs of a desalinization facility has not been conducted. The implications regarding impacts on the cost of water for the West Basin service area need to be further evaluated.
3. We are concerned with the environmental impact of the proposed desalinization project especially in terms of energy use and GHG production. Other more environmentally favorable alternatives such as expansion of recycled water production should be exhausted before pursuing the desalinization alternative.
4. Since the proposed desalination facility is so sensitive to energy costs, what protections are proposed to ensure long term economic feasibility of operating the facility in the event of large increases in energy costs in the future? There are a number of examples of desalinization facilities that have been shut down due to economic infeasibility.
5. All the agencies in the West Basin are facing a difficult challenge to meet stormwater pollution control mandates. We favor multi-benefit approaches to problem solving and this seems to be an area where there can be more coordination between West Basin and the agencies in its service area. One example would be a project sponsored by the Ballona Creek watershed agencies that is currently under development. This project will treat an average of 6.46 MGD through a process of in-line ultraviolet (UV) or ozone disinfection technology and return the clean water to the creek to flow to the ocean. In lieu of returning the treated water to the ocean, some of this water could be diverted to West Basin for further treatment to make it useable as recycled water to serve Culver City or even potentially for direct reuse. More research in the area of stormwater capture and reuse is needed. Capture of dry weather and portions of wet weather stormwater flows for treatment and reuse for a regional solution to both stormwater pollution control and water supply is an area that needs further analysis.

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

Thank you again for the consideration of our comments to DEIR.