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From:	Langis, Rene/BOS
To:	Jonna Engel PhD (jengel@coastal.ca.gov)
Cc:	Stephen O"Kane; Tracy Powell; Salamy, Jerry/SAC
Subject:	Request to revise CCC wetland determination at the RBEP (12-AFC-03) site
Date:	Monday, May 11, 2015 12:03:43 PM
Attachments:	AttchmtA.WCBBP Injection Well Map.pdf

Dear Dr. Engel,

In their preliminary staff assessment report, the California Energy Commission determined that five features located on the Redondo Beach Energy Project site were Coastal Commission defined wetlands. This finding was based on information that the Coastal Commission provided following the site assessment conducted on January 22, 2014 and wetland delineation datasheets provided by AES. During that meeting you mentioned that you could revisit your conclusions if the project proponent was able to show that the hydrology driving wetland features is artificially induced due to regional measures implemented to protect groundwater aquifers from salt water intrusion.

During that meeting, Mr. Tracy Powell, environmental engineer for AES Southland, indicated that these "wetlands" were being fed artificially by the West Basin Water District who has been using injection wells in close proximity to the RBEP site since the 1960s to maintain a salt water intrusion barrier and protect the inland aquifers. The Los Angeles Department of Water and Power (owners of the barrier well system), have provided the attached map showing the location of the wells within a 1 mile radius of the RBEP (Attachment A).This injection well program has resulted in an artificially high man made ground water table and created the need to install and operate a groundwater dewatering system. This system has kept the groundwater table approximately three to five feet below ground surface in the former fuel tank area until 2012 when AES Southland discovered that the groundwater dewatering system was underperforming. In 2014, the rise in groundwater in the areas surrounding several of the tank pads indicated that the two dewatering pumps installed on the AES Redondo Beach property were operating well under design capacities. As expected, the system's pump failure allowed the groundwater table to rise to the ground surface thereby providing wetland hydrology and the subsequent development of the hydric soils and wetland vegetation conditions that you observed in the former fuel tank basins in January 2014. One of these pumps was replaced in December 2014 and the other is scheduled to be installed in June 2015. Even with only one pump functioning water levels have already receded in the former tank basins 1, 2, 3 and 4, as well as in the constructed pit. Once the groundwater dewatering system is fully functioning, no wetland hydrology will exist in the constructed pit and former fuel tank area and it is anticipated that wetland hydrology indicators, hydric soils and wetland vegetation will disappear as the area reverts back to an upland.

Based on the information provided above, we respectfully request your concurrence with our determination that Coastal Commission wetlands are not present on the RBEP site due to artificially induced hydrology.

AES Southland has compiled this information with the water agencies involved with the barrier well system (WBWD, LAWP, and LA County), and will be happy to reach out to them should you have any questions or need more information.

Respectfully submitted,

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West Coast Basin Barrier Project
Injection Wells within 1 mile radius of AES