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June 3, 2019



Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

Dear Ms. Townsend:

Subject: OTC Policy: 2017-2018 Interim Mitigation Determinations;  
Los Angeles Department of Water and Power – Harbor, Haynes and  
Scattergood Generating Stations

This is in response to the Notice of Opportunity for Public Comment dated May 13, 2019, for the 2017-2018 Draft Determinations to Approve Mitigation Measures for the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (OTC Policy) (Enclosure 1). The Los Angeles Department of Water and Power (LADWP) has reviewed this Determination for its Harbor, Haynes, and Scattergood Generating Stations and has no additional comments or recommendations.

LADWP appreciates the correspondence and opportunity to comment. If you have any questions please contact Mr. Alberto Martinez of the Wastewater Quality and Compliance Group at (213) 367-1793.

Sincerely,

A handwritten signature in blue ink that reads 'Katherine Rubin'.

Katherine Rubin  
Manager of Wastewater Quality and Compliance

AM:

Enclosures

c/enc: Jonathan Bishop, SWRCB  
Karen Mogus, SWRCB  
Rebecca Fitzgerald, SWRCB  
Katherine Walsh, SWRCB  
Julie Johnson, SWRCB

Enclosure 1:

**2017-2018 DRAFT DETERMINATIONS TO APPROVE MITIGATION MEASURES  
FOR THE WATER QUALITY CONTROL POLICY ON THE  
USE OF COASTAL AND ESTUARINE WATERS FOR POWER PLANT COOLING**

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State Water Resources Control Board

## NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT

### 2017-2018 DRAFT DETERMINATIONS TO APPROVE MITIGATION MEASURES FOR THE WATER QUALITY CONTROL POLICY ON THE USE OF COASTAL AND ESTUARINE WATERS FOR POWER PLANT COOLING

ALAMITOS GENERATING STATION  
DIABLO CANYON NUCLEAR POWER PLANT  
ENCINA POWER STATION  
HARBOR GENERATING STATION  
HAYNES GENERATING STATION  
HUNTINGTON BEACH GENERATING STATION  
ORMOND BEACH GENERATING STATION  
REDONDO BEACH GENERATING STATION  
SCATTERGOOD GENERATING STATION

**NOTICE IS HEREBY GIVEN** that the State Water Resources Control Board (State Water Board) will receive public comments on the 2017-2018 Draft Determinations to Approve Mitigation Measures for the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (also known as the Once-Through Cooling or OTC Policy) for the nine power plants listed above. A draft determination is available for each power plant.

#### BACKGROUND

The State Water Board's 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. The interim mitigation period commenced on October 1, 2015, and continues up to and until owners or operators achieve final compliance with the OTC Policy. Section 2.C(3) of the OTC Policy provides information required to demonstrate compliance with the interim mitigation requirements. State Water Board [Resolution No. 2015-0057](#) describes the procedures for calculating the interim mitigation payment and approving mitigation measures. In accordance with Resolution No. 2015-0057, the State Water Board prepared annual draft determinations approving interim mitigation measures for each of the nine power plants listed above.

#### DOCUMENT AVAILABILITY

The draft determinations are available on the State Water Board's web site at:  
[https://www.waterboards.ca.gov/water\\_issues/programs/ocean/cwa316/interim\\_mitigation.html](https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/interim_mitigation.html).

**SUBMISSION OF WRITTEN COMMENTS**

State Water Board staff is accepting input and recommendations through written comments. Written comments must be received no later than **12:00 noon on June 4, 2019**, and addressed to:

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000 (mail)  
1001 I Street, 24<sup>th</sup> Floor, Sacramento, CA 95814 (hand-delivery)

Comment letters may be submitted electronically, in pdf text format (if less than 15 megabytes in total size), to the Clerk to the Board via e-mail at [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov). If the file is greater than 15 megabytes in total size, then the comment letter may be submitted by fax at (916) 341-5620. Please indicate in the subject line: **“OTC Policy: 2017-2018 Interim Mitigation Determinations.”**

Couriers delivering hard copies of comment letters must check in with lobby security personnel, who can contact Ms. Townsend at (916) 341-5600.

**ADDITIONAL INFORMATION**

Please direct questions about this notice or the OTC Policy's interim mitigation measures to Julie Johnson at (916) 341-5687 or via email at [Julie.Johnson@waterboards.ca.gov](mailto:Julie.Johnson@waterboards.ca.gov), or Katherine Walsh at (916) 445-2317 or via email at [Katherine.Walsh@waterboards.ca.gov](mailto:Katherine.Walsh@waterboards.ca.gov).

\_\_\_\_\_ May 13, 2019  
Date

  
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Jeanine Townsend  
Clerk to the Board