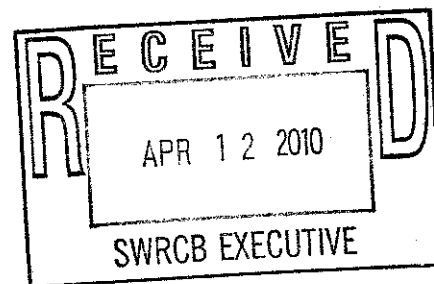


5/4/10 Board Meeting
Once Through Cooling
Deadline: 4/13/10 by 12 noon

From: Richard Gallegos <rich.a.gallegos@gmail.com>
To: <commentletters@waterboards.ca.gov>
Date: Sunday, April 11, 2010 10:48 PM
Subject: Once-through-Cooling (OTC) Policy



Apr 12, 2010

Chairman Charlie R. Hoppin
1001 I Street
Sacramento, CA 95814

Dear Chairman Hoppin,

California power plants using the "once-through cooling" (OTC) withdraw some 16 billion gallons of water daily from the ocean and the Delta, killing aquatic life at all levels of the food chain. Larvae and small fish are sucked into the plants and perish in the turbines. Endangered Chinook salmon, sea turtles, marine mammals and large fish are trapped by the force of rushing water and die on the plant's intake screens. As a result, billions of fish and other forms of marine life are killed every year by OTC.

The Federal Clean Water Act calls for the phase-out of this destructive practice. While, I appreciate the Board's past efforts to develop a state policy that seeks to protect California's ecosystems from OTC, recent changes to the current draft of the OTC policy meet neither the letter nor the intent of the Clean Water Act's requirement to phase out these antiquated, inefficient, and environmentally destructive cooling systems.

The State Water Board needs to reject these recently-proposed OTC policy amendments that undermine California's movement away from the phase out of once-through cooling systems. Rather, the OTC policy needs to be significantly strengthened to reinforce the state's commitment to ensuring that these facilities adopt the best scientific technology available - based on immediate and certain time frames.

Stronger versions of the OTC policy have been described by the state's major power agencies as providing a "workable schedule" that "maintain[s] reliable operation of the electric grid." In addition, the state's electrical grid oversight agency has itself found that many older power plants have "higher greenhouse gas emission rates and other pollutants" than new generation sources. OTC method power plants are inefficient and generally operate in a manner destructive to the environment, and as a result undermine California's state pioneering efforts to reduce greenhouse gas emissions.

California has invested significant efforts and monies to restore our marine, coastal and Delta habitats. An OTC policy that meets the letter and intent of the law is essential to strengthening our continuing investment in healthy and vibrant ecosystems. I ask the Water Board to reject the proposed proposed amendments that move us away from this important goal.

Sincerely,

Richard Gallegos
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