From:	MJ Baretich
To:	opc.comments@scc.ca.gov
Cc:	PARS11
Subject:	OPC Draft Strategic Action Plan
Date:	Sunday, September 04, 2011 1:46:37 PM

Dear Ocean Protection Council members:

Thank you for giving us an opportunity to address the Ocean Protection Council's Draft Strategic Action Plan.

In the recent Subsequent Environmental Impact Report (SEIR) on the proposed Poseidon Desalination Plant in Huntington Beach, the California Coastal Commission (CCC) presented strong arguments in opposition to the design and siting of this facility. The following Coastal Act Section was cited in a June 2010 letter from the CCC to the City of Huntington Beach regarding the SEIR:

"Coastal Act Section 30231 reads, in full:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoffs preventing depletion of ground water supplies and substantial interference with surface water flow encouraging waste water reclamation, maintaining natural vegetation buffers areas that protect riparian habitats, and minimizing alteration of natural streams. (emphasis added)"

The OPC strategic plan now contains strong language banning the use of once through cooling (OTC) and the disposal of brine mixed with solvents into our ocean. The project planned by Poseidon Resources in Huntington Beach would use both of these destructive processes.

Entrainment and impingement impacts caused by open water intakes such as proposed by Poseidon in Huntington Beach, utilizing the antiquated Huntington Beach AES OTC, have been found to result in significant adverse effects to marine life, due to open seawater intakes. In addition, brine discharges, high energy usage and projected water costs are unacceptable.

We, the Cabrillo Wetlands Conservancy, support OPC's encouragement of the construction of alternative sub-seafloor seawater beach-well intakes to replace the existing Huntington Beach AES open ocean intake. Poseidon rejected these ideas and chose to use the antiquated AES water intake system which is destined to go away in 2020. The dismantling of Units 3 and 4 are to start in October 2012, with units 1 and 2 to follow soon after. Pressure needs to be put on preventing Poseidon's use of the existing AES OTC system.

Alternative sources of water are available in many locations such as proven by the world famed Ground Water Replenishment System in Fountain Valley, California. This is an example of what can be done elsewhere in the State and in the World.

The OC Ground Water Replenishment System and OCWD are currently supplying 75% of the water to Orange County through their various methods of replenishing water back into our aquifers. This first phase produces approximately 70 million gallons (265,000 cubic meters) of high-quality water every day. This is enough water to meet the needs of nearly 600,000 residents in north and central Orange County, California.They plan to expand this capability through expansion of the existing system to 103,000 acre-feet of water per year, enough water for 850,000 people. The project will help prevent predicted serious water shortages in the future. Currently 21 Orange County Cities and water agencies pump water from the aquifer.

The GWRS produces water at one-half the energy currently required to import water into Orange County and one-third the energy to desalinate seawater, making the GWRS water more energy

efficient than imported water or ocean desalination.

We support your efforts to determine whether new technologies might lower costs and reduce impacts. Desalination plants, if designed efficiently, cost-effectively, and with a low impact on the environment, might be a future alternate source of water, but the facilities being proposed for the Huntington Beach Poseidon Desalination Plant using OTC must be prohibited as designed.

Thank you for allowing us to comment,

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