

From: caitlin_hurkes
To: opc.comments@scc.ca.gov
Subject: OPC Comment Letter
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September 14, 2011

John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Via email to opc.comments@scc.ca.gov

Re: Comments on OPC Draft Strategic Plan

Dear Mr. Laird,

As a California resident who is concerned about our ocean I am writing to submit my comments on the Ocean Protection Council's (OPC) Draft Strategic Plan. I would first like to commend the OPC staff on their work in identifying the fifteen issues in the plan as priorities for the attention of the OPC. All of these issues are either directly impacting our ocean or our ability to respond to important ocean issues and should remain in the final version of the plan.

For this letter, I will focus on the Desalination and Once-Through Cooling Section within the Draft Strategic Plan. First of all, I am very concerned about attempts by proponents of ocean desalination to push the Ocean Protection Council away from one of its key guidance principals from the Ocean Protection Act, "recognizing the 'precautionary principle': where the possibility of serious harm exists, lack of scientific certainty should not preclude action to prevent the harm" as it relates to the use of once through cooling pipes for desalination. It is clear from the OPC's 2006 resolution on the use of once-through cooling (OTC) in ocean waters that every study done on the use of OTC pipes in California has shown "adverse impacts" to ocean community structure and that the "possible impacts of impingement and entrainment are unknown" that there is a clear possibility of serious harm to marine resources from the use of OTC pipes for ocean desalination.

With this in mind, I am requesting that the essence of the language and metrics in section 9.2.1 of the Draft Strategic Plan, that calls for consistency with previous SWRCB and OPC positions on the use of OTC pipes, is kept in the revised draft Strategic Plan. Additionally, I support the intent of the language in sections 9.2 and 9.2.3 that that calls for all agencies to work together to develop better siting and design criteria, and end the current siting focus on co-location with existing power plants. Also ,it is important that the independent review for alternative intake designs called for in section 9.2.2 is retained in any revision of the Draft Strategic Plan.

In closing, I would like to remind the members and staff of the OPC that the Ocean Protection Act states that the offshore waters and ocean resources of California are held in trust for the people, not for industry, and that State decisions affecting coastal waters and the ocean environment should be designed and implemented to conserve the health and diversity of ocean life and ecosystems. Current ocean desalination technology is simply not compatible with the goal of maintaining healthy coastal and ocean ecosystems and the sustainable use of ocean resources.

Thank you for considering my comments,

Caitlin Hurkes