

TO: John Robertus, Executive Director
California Region Water Quality Control Board
San Diego - Region 9
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SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

2009 APR -3 P 1:12

DATE: April 2, 2009

RE: Carlsbad-Poseidon Desalination NPDES Permit [Order# R-9-2006-0065]

Dear Mr. Robertus:

We are writing as a group of Californians dedicated to restoring and protecting our coast and ocean. We are very concerned about the design and technology of the Carlsbad-Poseidon Desalination Project as it is currently proposed.

First, we want to be clear that we are not strictly opposed to ocean desalination. However, we have warned from the beginning of the planning of this facility, and others like it, not to rely on the continued existence of "once-through cooling" intakes as source water for ocean desalination. This antiquated technology has been all but prohibited by the federal courts and is currently being reviewed for a phase-out plan by California agencies led by the State Water Resources Control Board. Sound public policy and the mandates of the Porter-Cologne Act make it clear that co-locating with power stations to share the ocean intake for the dual purposes of cooling water and desalination source water is a design whose time has passed even before these massive ocean desalination facilities are permitted.

We hope the Regional Board will strictly apply the law and require minimizing the intake and mortality of marine life at this facility – the mandate of the Porter-Cologne Act. Unfortunately, as it is currently designed, the immediate operation of the facility would exacerbate the current destruction of marine life by withdrawing more seawater than the co-located coastal power station. Further, the design does not adequately look to the future and ensure that once the coastal power station is re-powered or retired, the desalination facility will be compelled to use the best design and technology to avoid the intake and mortality of marine life.

The documentation provided by the project proponent fails to adequately identify a design capacity for the output of the facility that is compatible with alternatives for desalination source water intake technologies to eliminate the intake and mortality of marine life. Sub-seafloor intakes have been proven to work around the world and several pilot projects in California have proven the feasibility of these alternative intakes.

This should be the standard for all future desalination facilities in the State.

Instead, Poseidon Resources argues that they can "mitigate" the marine life mortality through after-the-fact restorative measures. The federal courts have found this approach

illegal and inconsistent with the clear mandates of the Clean Water Act to use the best technology available to minimize adverse impacts in the first place. Similarly, the Porter-Cologne Act mandates "mitigating" the intake and mortality of marine life in the first place – not attempting to restore the damage after the fact. Importantly, California's Porter-Cologne Act does not distinguish cooling water intakes for coastal power plants from seawater desalination or any other industrial use of seawater. Consequently, the Regional Board should apply the same standards to ocean desalination that were established by the federal courts for cooling water intakes.

We implore you to craft a permit that:

- 1) does not allow the desalination facility to withdraw ocean water beyond what the coastal power station withdraws at any given time, and**
- 2) to make it clear this temporary permit will be automatically re-opened should the power station re-power or retire any of their generators and cooling water intake demand. The NPDES permit should be clear that sub-seafloor intakes are currently the best technology for minimizing the intake and mortality of marine life.**

On behalf of the petition signatories, we thank you for everything you do to restore and protect our water quality, and the future health of our marine environment.

Stop the Unnecessary Destruction of Marine Life

Dear Chairman Wright, Board Members, SWRCB Liaison Ms. Spivey-Weber and Executive Director Robertus:

We are writing as Californians across the State who are dedicated to restoring and protecting our coast and ocean for this and future generations.

We are opposed to the current permit conditions that allow the co-location of the Poseidon-Carlsbad Ocean Desalination Facility at the Encina Power Station.

- The current permit would allow the intake and mortality of more marine life than is currently being destroyed by the Encina Power Station's once-through cooling (OTC) system;
- The current design capacity of the Poseidon-Carlsbad desalination facility would facilitate the continued intake and mortality of marine life beyond the date when the Encina Power Station either upgrades its generators and abandons the OTC system, or ceases operation;
- The current permit conditions rely on unproven and, as yet undefined, plans to restore marine life in contradiction of the clear language in California's Porter-Cologne Act to minimize marine life intake and mortality in the first place. Sub-seafloor intake systems are a proven alternative to minimize marine life intake and mortality currently attributable to open seawater intakes;
- The Poseidon-Carlsbad intake permit should set the highest standard for enforcement of California's laws to restore and protect marine life mortality. This is just the first of many potential desalination proposals coast-wide. The State Water Resources Control Board and San Diego Regional Board should send a clear message to future project proponents that ocean desalination facilities should be designed to accommodate technology that minimizes the intake and mortality of marine life. Designing massive ocean desalination facilities and then "shoe-horning" in sub-standard intake systems is not sound public policy.

We are not opposed to ocean desalination. However, we oppose the current permit language as it does not meet the clear standards of California's law to protect our precious marine life.

We strongly urge you to either:

- 1) Deny the current proposal and insist on a facility capacity design, location and intake technology that minimizes marine life mortality in the first place (e.g., sub-seafloor intakes); OR
 - 2) Limit the interim operation of the CDP to only the water being withdrawn by the Encina Power Station, AND
- Insert a provision to automatically re-open the permit when the current cooling water intake is abandoned or consistently falls below the required 304 mgd - with specific language to guarantee the construction and use of sub-seafloor intakes.

Signed

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Lisa Sakai
Randal Sargent
Amber Schmidt
Tyler Schumacher
Katherine Seeker
Larry Shapiro
Ashleigh Shepard
Brian Slattery
Krista Soccolich

Heather Steele
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megan sudnik
tami sullivan
richard swaja
Honora Swanson
Kimberly Tays
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Tim Uplinger
don vanderpot
James Ward
Julie Wartell
Matt Waters
John Waterson
John Webster
seth weinberg
Derek Wilson
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Barbara Aguado
Lenise Andrade
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Blaize Baehrens
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Nathan Botts
Sara Brinkley
Kat campbell
sarah campbell
Rebecca Carnes
lisa chen
lisa chestnut
Trevor Cooper
Carrie Cortazzo
BreAnne Custodio
Ken David
Jessica Derevjanik
Dana Dolder
Royce Dorman
Chris Einspahr
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Alexandra Perry
steve rogers
Ric Shellhammer
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William Super
Jane Thayer
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Brett Wagner
Bruce Wilson
Michael Wohl
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Sharon Peck
Wade Robertson
vesna vukov