

From: Steve Gosschke <scg1561@charter.net>
To: <commentletters@waterboards.ca.gov>
Date: 4/11/2010 1:29 PM
Subject: Comment Letter - OTC

I think a blanket policy – such as the one that is being proposed (NO Once Through Cooling) is short sighted and will be bad for California. This oversimplified approach to problem solving will result in excessive costs, and often times, prohibits the implementation of actions and solutions that would truly result in the greater good of all.

I am sure you are getting numerous letters from Activists (I refuse to call them environmentalist, since many of their actions are truly not environmental), are advocating the complete cessation of OTC immediately. They appear to have not stopped to consider the impact this will have on air quality (increased greenhouse gas production, more PM10, more hazardous waste generation, and a myriad of other consequences (some intended, some unintended), that will necessarily follow the implementation of this prohibition. Stretching out the cessation of OTC as you have proposed will just phase the cost and consequences in over time.

Your draft policy smells more like politics than science to me. Is it really so politically untenable to not support a policy that will raise costs and drive businesses (and jobs) out of the state where they are so desperately needed. Are we so rich that we can continue to pass uneconomic policy, that the science clearly does not support? Are policies such as this subject to the CEQA/EIR process? Certainly that analysis would show that stopping once through cooling is going to have a tremendous overall negative impact.

If this policy is adopted, I will certainly find myself asking, "where will it all stop". If once through cooling is outlawed, how soon will it be until boating is outlawed (surely the cooling water that flows through these engines harm larvae too?). Desal plants surely will be targeted at some point, will they not? If the water board can prohibit once through cooling than surely the Air boards can prohibit emissions (both from engine exhaust stacks, and cooling towers, and from cars?).

I recommend that you do not adopt this proposed policy. I urge you to listen to the scientist, not the rhetoric of the activists. I would hope that you would use your intellect and craft solutions considering all the ramifications, and not focus on the single issue of banning ocean cooling. I guess I am just asking you to 'use your head'. As a resident of California, I would just like to see our elected officials use some common sense for a change.

