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To: <commentletters@waterboards.ca.gov>
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Subject: Comment Letter - OTC Policy

Apr 10, 2010

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

Dear Chairman Hoppin,

More and more we are following the Japanese in there irreverence towards aquatic life. they are dragging and whaling killing sharks and dolphins illegally to sell food for profit.

Our ""once through" dooling systems just kill indiscriminately with no use for the marine life that it decimates. I see where the Japanese profit and why; who profits from our destroying the balance of life in our water with the turbines? What is the logic of ever having used this technology in the first place when we are such a quick learning country of engineers? Have we become a country of quick filing lawyers who protect our blundering designs rather than change them?

Shame on the ones who are saving and making money by holding onto these dirty old turbine boots that stomp on balance and eventually the well being of any one who needs water.

The once through turbine idea "sucks" It will always "suck us back in" it has for long enough. It is just like the once through (with) American sexual OTM game: " Once-through-mating" practice of the early sexist idea that felt good at the time. What are we doing for the virgin marine life that is "sucked" once through. It hurts them to death the first time; and then "once" they are "through" we are too?

The rape metaphor is apt. We need to find and reveal the rapists and then perhaps they will be "throug once", and cooling there old dirty turbine boot heels.

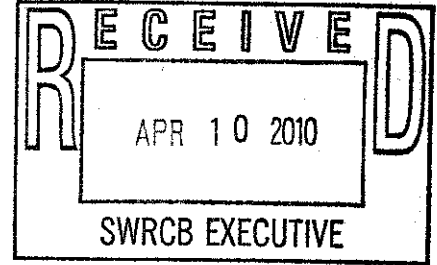
Most Americans don't know about these torture turbines, wo is responsible for hiding the news about the outdated suckers?

How on earth (if we wish to stay on earth) can we can we ignore the toll and propose more ignorant policy amendments that delay action against the old turbines; Turbines that should have never been used against our wild aquatic life in the first place?

Who is paying these "once through" attorneys? Who is profiting by delaying the phasing out of the butcher turbines. Who made money installing them, using them, and now by preventing retiring them?

WHO'S MONEY IS IS BEING PROTECTED WHILE WE ALL HEAD TOWARDS BANKRUPTING OUR AQUATIC WILDLIFE AND OUR OWN water and marinelife-dependent lives.
If we continue to use water with no regard for how we keep it alive then cooling an energy plant will be a moot point. We will be going to war because we are thirsty not for electricity.

The ONC turbine practice is like having a mosquito on our neck that has



the capacity to reach the jugular vein.
These turbines are "sucking" up more water than our banks are sucking up bailout money!
And doing it in the most virgin filled ocean and Delta waters.

Power plants using "once-through cooling" (OTC) are currently allowed to withdraw more than 16 billion gallons of ocean and Delta water every day, killing aquatic life from all levels of the food chain. Larvae and small fish get sucked into the plants and die in the turbines. Larger fish (including the endangered Chinook salmon), turtles, and marine mammals get trapped by the force of the rushing water and die on the intake screens. All told, an estimated 79 billion fish and other marine life are killed every year by OTC.

The Clean Water Act called for the phase-out of this destructive practice almost four decades ago. We appreciate your past efforts to develop a state policy that would protect California's ecosystems from OTC. However, the recent, major changes to the latest draft of the OTC policy meet neither the letter nor the intent of the Clean Water Act to phase out these antiquated, inefficient, environmentally harmful cooling systems.

I urge the State Water Board to reject recently-proposed OTC policy amendments that move the state away from a path to phase out once-through cooling systems. The OTC policy needs to be strengthened significantly to reinforce the state's commitment to ensuring that these facilities adopt the "best technology available" based on swift, certain timeframes.

Prior, stronger versions of the policy were described by the state's top three power agencies as providing a "workable schedule" that "maintain[s] reliable operation of the electric grid."
The electrical grid oversight agency itself found that many older power plants also have "higher greenhouse gas emission rates and other pollutants than new generation sources." Once-through cooling enables inefficient power plants to operate at the expense of the environment and undermines state goals to reduce greenhouse gas emissions.

California has invested significant attention and dollars to restoring and maintaining our marine, coastal and Delta habitats. A protective OTC policy that meets the letter and intent of the law is essential to maintain these ongoing investments in healthy ecosystems. Please reject proposed amendments that move us backwards from this goal.

Sincerely,

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