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Date: 10/10/2011 7:02 AM

Subject: Comment on Draft Scope of Work OTC

General comment: The approach needs to be more forward looking, more creative, instead there is a general tone of re-examining previously tried techniques to come to the inevitable conclusion that " we tried, it did not work."

3.3 #1 is a point in case. The *requirement* that the technology should be "commercially available" is ludicrous. If the technology were that easily obtainable it would indeed already be in place. Perhaps new approaches, creative approaches are called for: sometimes creation means putting together existing elements in a new configuration. Perhaps a call for work should be put out.

*3.5**Technologies to be evaluated*. #7. Is there any background information on "substrate collection"? To my knowledge there are some wells deep into sandy soil used for Desal purposes, which would of course prevent most marine organisms from being sucked into the intake.

There is no mention at all of biological solutions even though there have been recommendations that use of ocean water for cooling purposes be ramped down or completely shut off during prime spawning times.

2.2 The above points to a glaring lack in the *Criteria for selecting* a consultant: experience with 316B could call for an attorney; what is really needed is a marine biologist.

The list of *references* is rather scanty. No mention of the many PIER --funded WISER studies by the CEC. (Public Interest Energy Research by the California Energy Commission. Examples:

"Understanding Entrainment at Coastal Power Plants: Results from the WISER Program for Studying Impacts and their Reduction" CEC PIER program November 2010.

CEC-500-2007-120 March 2008 "Understanding Entrainment at Coastal Power Plants: Informing a Program to Study Impacts and their Reduction."

Another technology might be suggested by CEC-200-2009-013-SD in case of the need for shut-downs during heavy spawning seasons, it's title being "Implementation of Once-through Cooling through Energy Infrastructure Planning and Procurement."

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