

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2) Limit the interim operation of the CDP to only the water being withdrawn by the Encina Power Station, AND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.


robert mclean

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Date Signed

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