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Public Comment to RWQCB for April 8, 2009

My name is Guy McClellan and I would like to comment on the mitigation plan proposed by Poseidon Resources for the Carlsbad Desalination plant. I am a chemist, a surfer, and until recently an avid golfer. As I've read more about the ongoing water shortage and the formation of 'garbage island' in the Pacific Ocean, I've put away the golf clubs and turned my efforts towards beach cleanups and water conservation efforts.

All signs indicate that desalination will play an important role in California's future water portfolio. In this debate, we must address the cost, high energy use, and environmental impacts through discharge of brine, chemicals, and carbon dioxide. Desalination is still the most expensive source of water due to its high energy costs. These costs will be passed on to the consumer, and the costs will increase if the plant operates below capacity as exemplified by the Tampa Bay Water Desalination plant that was developed by Poseidon Resources, then outsourced to multinational water agencies Acciona and EWH. That 25 million-gallon/day plant came online late, over budget, and has rarely operated at full capacity. Every day that they operate under capacity, the public sector loses and the private sector gains. We must consider alternatives that provide the same benefits at lower cost, such as, reclamation and conservation.

The plan to mitigate damage done to the marine ecosystem by a desalination plant in Carlsbad is to plant trees inland to offset carbon dioxide emissions from increased power use. There is no chosen location for a marine mitigation project, and that is a glaring deficiency to the current plan. The management at Poseidon Resources believes that they can destroy one area of the environment and then create an ecosystem nearby to make up for it. One of the aspects of mitigation even involves stewardship of the water area immediately adjacent the power plant. This is the very same water they are most likely to pollute through discharge that may very well get drawn back into the intake pipe due to ocean's currents. Are we to expect that the polluters are in the best position to also be stewards of our local resources?

With regards to impingement and entrainment, the studies from the Encinas Power Station indicate that there will be a consistent level of destruction of small fish and fish eggs. The ocean is already overfished and we should not overlook the slaughter of small fish and fish eggs. This is especially detrimental to the future growth of our fish population. Poseidon has often stated that "2 lbs" of fish per day are impacted, while the numbers from the report show up to 40 lbs of small fish and eggs per day. In their report, they made the assumption that this was due to toxic run-off from our streets killing fish and then subsequently sucking these fish and toxic run-off into the plant. Perhaps that toxic run-off should be mitigated as well, if we are concerned with water supply, let's look into reclamation from our storm drains as well to help protect the ocean and wildlife. As an alternative, upgrades at current water reclamation facilities could achieve a similar end more economically and efficiently, with no impact on our ocean.

Furthermore, private sector control of water supply is a dangerous precedent to set. It allows supply and allocation decisions on a resource vital to the survival of humans to be made by an entity that is responsible only to its shareholders, not its clientele. This approach is funded by multinational investment corporations disguised as local utilities with little vested interest in preserving our local resources or environment. These multinationals are the last people I would contract to restore ecosystems and steward our natural resources.

According to Fortune Magazine, "Water is one of the world's greatest business opportunities. It promises to be to the 21st century what oil was to the 20th." The demand for clean water is triggering the fastest growing commodity boom in history. T. Boone Pickens is buying up all the water in Texas. Nestle is doing its best to bottle the Great Lakes. And here in California, nearly 20 different desalination plants have been proposed from San Diego to Marin and the race to privatization of our natural resources is at full throttle.

Faced with the suddenly well-documented freshwater crisis, governments and international institutions are advocating a Washington Consensus solution: the privatization and commoditization of water. Price water, they say in chorus; put it up for sale and let the market determine its future. For them, the debate is closed. Water, say the World Bank and the United Nations, is a "human need," not a "human right." These are not semantics; the difference in interpretation is crucial. A human need can be supplied many ways, especially for those with money. No one can sell a human right.

I recently watched a documentary called, "The American Southwest: Are We Running Dry?" that was sponsored by grants from the Metropolitan Water District of Southern California, California Water Association, and others. While many great points were made regarding the shortage of water in the Southwest, the solution was 'more water' not 'more responsible use' of water. After hearing many of our elected officials say, "We can't conserve our way out of this problem." I was compelled to disagree. We can conserve our way out of this problem, but they can make more money if they put in a power hungry desalination plant. I'd like to note on the record that many of our elected officials are fully behind the privatization of our precious water supplies by multinational corporations.

Sincerely,

Guy McClellan