Los Cerritos Wetlands Land Trust
for Long Beach and Seal Beach

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Katherine Faick, Environmental Scientist
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Via Electronic Mail: Katherine.Faick@waterboards.ca.gov

RE: OTC Draft Determination for Haynes Generating Station & Alamitos Generating Station

Dear Chair Markus,

On behalf of the Los Cerritos Wetlands Land Trust, we are writing in regards to the State Water Resources Control Board's consideration of interim mitigation for mortality resulting from the once-through cooling (OTC) operations at the Haynes and AES-Alamitos generating stations in the Los Cerritos Wetlands. We very much appreciate your thoughtful consideration of the comments and recommendation below.

The Los Cerritos Wetlands Land Trust is a local non-profit organization dedicated to the restoration and protection of the wetlands immediately adjacent to the Alamitos and Haynes power plants.

For the reasons below, we strongly urge you to recommend the Ocean Protection Council and/or Coastal Conservancy use the mitigation funding for restoration of habitat and aquatic life populations in the Los Cerritos Wetlands – the source water body most directly impacted by the interim OTC operations. We suggest the mitigation funds be appropriated to the Los Cerritos Wetlands Authority with the expressed stipulation that the expenditure of the funds must prove to result in the intended purpose of replacing aquatic life lost to the operation of the two OTC systems. As implied in the draft decision for Alamitos and Haynes, the mitigation fees should be spent on improvements to habitat values in the Los Cerritos Wetlands, or acquisition of adjacent property that will result in expanded habitat, resulting in the replacement of the aquatic life lost in the cooling water intake. Further, the calculated 20% additional fees should be set aside to monitor the progress of the restoration projects to ensure they meet predetermined performance standards to replace the species lost to entrainment and impingement from the two power stations' interim OTC operations.

We understand the OTC Policy states a preference for mitigation funds to be directed towards Marine Protected Areas. Further, it is our understanding the State Water Board, Coastal Conservancy and Ocean Protection Council have agreed to a set allocation of the statewide mitigation fees between the Coastal Conservancy and Ocean Protection Council. Nonetheless, that "preference", and fee allocation agreement, does not, and should not, prohibit use of the mitigation funds for wetlands restoration projects that would result in "in-kind" habitat improvements and the restoration of species' populations directly impacted by historic and on-going entrainment and impingement. Clearly the Haynes and AES-Alamitos cooling water intakes are distinct from most other operating power plants in California in that the cooling water intakes are located in a bay and wetlands -- estuarine habitat.

The ETM/APF formula is intended to estimate the "area of production foregone" – what was once merely an attempt to illustrate the severity of impacts to marine life. More recently that formula has been adapted to estimate the amount of habitat restoration needed for replacement of the species suffering mortality in the cooling water intake. However, scientists admit that any mitigation calculation, including ETM/APF, are inherently difficult to ensure accuracy given the data-poor science on marine life populations and life histories, and the poorly understood complexity of marine ecosystems. And the numerous benefits of healthy coastal wetlands to a healthy marine ecosystem creates even greater complexity to calculating ecosystem "replacement" values.

However, it is clear that restoring in-kind habitat, in the same water body that is the source of the cooling water intake, provides greater assurances that the impact will be directly mitigated. Further, beyond ensuring direct replacement value of the impacted estuarine species' populations from wetlands restoration, nearshore Marine Protected Areas will indirectly benefit from restoring the ecosystem benefits of what is a small remnant of historical coastal wetlands in Southern California. Among a long list of ecosystem services, coastal wetlands provide: a natural filtration system for pollutants that degrade marine environments; forage species that are transported offshore and provide critical nutrition for marine species, and a "habitat link" for anadromous species that once inhabited regional watersheds in abundance but now are barely protected from extinction.

The Los Cerritos Wetlands Land Trust is well aware of the tenuous status of marine life populations, and we support the State's efforts to protect and restore marine ecosystems through adoption and maintenance of Marine Protected Areas. And we are more intimately familiar with the historical loss of estuarine habitat in the region and the immediate need to protect and restore what is left if we hope to restore the natural beauty and bounty of our coast and ocean past generations of Californians once enjoyed. As it is often said, you cannot put together a complex jig-saw puzzle unless you keep all the pieces.

Once again, we strongly urge the State Water Resources Control Board to include language in your decision to approve the interim mitigation proposed for Haynes and AES-Alamitos that directs the funding to restoration of habitat in the Los Cerritos Wetlands that will fulfill the intended purpose of the OTC Policy to replace aquatic life killed in the OTC systems.

If you or your staff has questions or concerns about the comments and recommendation above, please don't hesitate to contact us.

Sincerely,

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