

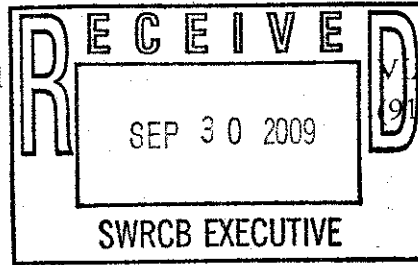


# Oxnard

Chamber of Commerce

September 29, 2009

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



VIA FACSIMILE  
(916) 341-5620

RE: OTC Policy

The Oxnard Chamber of Commerce has substantial concerns about the proposed water quality control policy regarding the use of once through cooling (OTC) in coastal electric generation facilities. We do not believe the proposal is reasonable public policy.

The dominant concern driving the proposed policy appears to be the impingement of fish and smaller organisms. According to a 2008 study conducted by MCB Applied Environment Services of Costa Mesa, a generating station in our community had no detectable adverse effects of its OTC operations. Their research indicated only a daily average of 12.25 fish and macro-invertebrates impinged during the plant's operations. This differs remarkably from the State Water Resources Control Board estimates of nearly 100 per day.

Our point is that by implementing the proposed OTC policy, energy supplies, dependability and costs would be significantly impacted by unverified data.

To the best of our knowledge, no cost-benefit analyses have been done on a site-by-site basis or collectively on the 19 existing coastal power plants.

Many of the businesses and residents in our community are under severe economic stress. The unemployment rate in Oxnard now exceeds 15%. The proposed OTC policy will only result in higher energy rates.

Should this OTC policy be implemented, it would compound the pressure on power generation along with AB 32 and the new mandate of one-third of all electricity to be generated from renewable sources by 2020.

At a time when many businesses and residents are financially hanging on by a thread, this is not the time to implement an unsubstantiated policy.

Sincerely,

Nancy Lindholm  
President/CEO