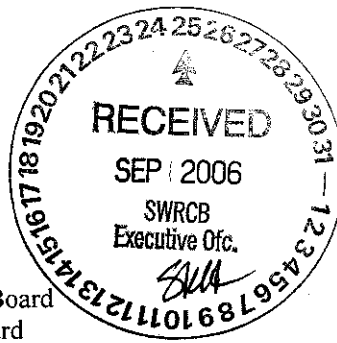


BY E-MAIL

September 25, 2006

Tam M. Doduc, Board Chair
Attention: Song Her, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95812-0100



COMMUNITIES FOR A
BBETTER
ENVIRONMENT



Re: **Comment Letter – Proposed Statewide Policy for Once-Through Cooling**

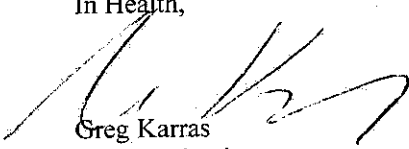
Dear Chairwoman Doduc:

Communities for a Better Environment (CBE) and Bayview Hunters Point Community Advocates (Advocates) submitted comments on the above-cited matter on September 22, 2005 and CBE joins in Advocates' September 15, 2006 comments on this matter. In the example we cited regarding the Potrero Power Plant, the Region 2 governing board agreed that once-through cooling *should* be prohibited. The Board modified its staff's draft permit, adding a finding of significant adverse impacts from entrainment, and adding language to the provisions stating its intent to prohibit once-through cooling unless the facility demonstrates a lack of significant impact. Order R2-2006-0032 Transcript at 203-204. This supplemental comment offers two additional suggestions regarding the scope of your policy review:

1. The State Board should analyze the policy alternative of prohibiting once-through cooling.
Many parties including some state agencies support prohibiting once-through cooling, and placing the burden to demonstrate any exceptions to a blanket phase-out requirement on the facilities seeking to continue once-through cooling. This environmentally superior alternative would comply with federal requirements and could avoid many of the problems with the Scoping Document's Proposed Policy that are identified by Advocates' September 15, 2006 comments.
2. The State Board should investigate the site-specific technical feasibility and cost of alternatives to once-through cooling at existing power plants in this policy review.
The Scoping Document does not analyze why regional boards have apparently *not* performed site-specific investigations of the technical feasibility and cost of alternatives to once-through cooling. This may be a fatal flaw. Independent investigations by others found feasible cooling alternatives that were not identified by the power companies' analyses at the Morro Bay and Potrero plants. Further, if a regional board fails to identify *actually* feasible alternatives at any of the other 19 plants, the Proposed Policy could automatically default to potentially illegal restoration.

Thank you for considering these supplemental comments.

In Health,


Greg Karras
Senior Scientist

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