



September 15, 2006

316 (b)
Once Through Cooling
Deadline: 9/15/06 5pm



Mr. Tam M. Dudoc
Chair, State Water Resources Control Board
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

Subject: Proposed Statewide Policy for Once-Through Cooling (CWA 316(b), Regulations)

Dear Mr. Dudoc:

The Department of Fish and Game has participated in the ongoing efforts of the State Board to develop the technical aspects of the Once-Through Policy. The Department provided testimony at the September 26, 2005 Laguna Beach Workshop on the policy. The Department supports the overall direction of the policy.

While the Departments focus is on minimizing the impacts of Once-Through Cooling on aquatic resources, we are concerned that limiting the types and location of restoration, limits the options for restoration which could be beneficial to the most sensitive habitats and species. Strict use of Habitat Production Forgone may restrict the ability of management agencies to develop the most comprehensive and effective restoration projects. The Department believes that for most projects, determination of the most effective restoration should be conducted on a case by case basis. This will require close coordination and collaboration.

We appreciate the opportunity to provide comments and are available to work with the Board and Regional Boards as projects go through the permitting process and the policy is applied.

Sincerely,

L. Ryan Broddrick
Director

