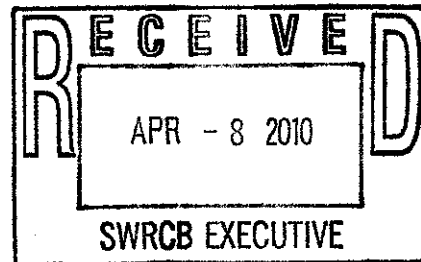


MARK STRAUCH
1680 SORRENTO PL
LIVERMORE, CALIFORNIA 94550

March 29, 2010



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

Subject: Comment Letter - OTC Policy

Dear Ms. Townsend,

I offer the following comments on the revision to the draft OTC policy.

Section 1, Paragraph L

"... Unlike older era fossil-fueled plants, if the nuclear-fueled power plants* undergo modernization as part of relicensing or cooling structure upgrades, that modernization will not reduce greenhouse gas emissions, and in fact, extended downtime during modernization may result in short-term increases in greenhouse gases as other greenhouse gas emitting facilities provide makeup power. ..."

I believe the use of the word "may" is incorrect, and should be replaced by "will." There is no way the State (or CAISO) is going to replace or offset 4600 MW of carbon-free electricity production in a clean manner.

Additionally, increased greenhouse gas emissions are not the only result of extended down-time of our nuclear power plants. Dangerous fossil fuel plants emit a variety of pollutants; these other pollutants should be enumerated as well.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark Strauch".