HUBBS-SEAWORLD RESEARCH INSTITUTE

DOCKET	
07-AFC-6	
DATE	APR 27 2012
RECD.	APR 27 2012

April 27, 2012

Energy Commission Docket Unit
1516 Ninth Street, MS-4
Sacramento, CA 95814

Ref: Carlsbad - Docket No. 07-AFC-06

Commissioners:

Thank you for affording us an opportunity to comment upon the docket item referenced above.

The Hubbs-SeaWorld Research Institute operates the Leon Raymond Hubbard, Jr. Marine Fish Hatchery located on the northeast corner of the outer Agua Hedionda Lagoon on a parcel owned by the applicant, NRG Energy. That laboratory rears and releases hundreds of thousands of juvenile fish annually to replenish stocks diminished because of habitat loss and over fishing. Key to the success of the program is the maintenance of the Lagoon as a healthy natural resource capable of supporting not only the myriad of species that call the Lagoon home, but also the wide variation of users that enjoy the recreational and commercial uses of the Lagoon. NRG has acted as an outstanding steward in managing that balance to the benefit of Lagoon, its inhabitants and the citizens of southern California.

When a regular eel grass survey of the Lagoon found *Culerpa taxifolia*, a highly invasive plant species known to out-compete native aquatic vegetation, NRG undertook the management and financial responsibility to respond and eradicate the threat. Without NRG's decisive leadership, this plant could have easily spread along the southern California coastline to many other lagoons and bays thereby greatly magnifying the problem. NRG's support of the Lagoon has gone well beyond its responsibility as owner to that of an outstanding neighbor and member of the Carlsbad community.

As a native San Diegan, a resident of north county and a marine scientist and conservationist, I appreciate NRG's support of our economy in as sustainable a manner as current technology will allow. The Encina plant was constructed during the Eisenhower Administration to meet the growing demand for the region's expanding economy. As natural gas became more available, the plant changed from burning bunker oil to gas, thereby greatly decreasing emissions relative to the amount of energy being produced. The proposed Carlsbad Energy Center will use state-of-the-art turbine technology that represents a quantum leap in efficiency. This will further reduce emissions per unit energy produced and increase reliability while using a far smaller physical footprint. The new Center will not rely upon access to the Lagoon for cooling water thereby significantly reducing its already negligible impact on organisms living in the Lagoon.

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On March 28, 2012 the California Energy Commission released its Revised Presiding Member's Proposed Decision which recommended approval of the proposed Carlsbad Energy Center. Our Institute is supportive of this decision and agrees with the finding that the Carlsbad Energy Center will serve an "extraordinary public purpose" by ensuring a reliable supply of power to the region. Further, as the new Center comes on line, it will pave the way for retirement of the existing Encina plant thereby affording an opportunity for redevelopment of that property to the benefit of Carlsbad residents and visitors. The proposed Center will produce more energy with a markedly reduced carbon footprint utilizing natural gas which is abundant in the US thereby providing a sustainable solution to the region's growing energy needs.

Hubbs-SeaWorld Research Institute has worked for the past 50 years to provide regulatory agencies with the information required to make considered resource management decisions. With this history in mind, we offer our concurrence with the March 28th Revised Presiding Member's Proposed Decision that the proposed Carlsbad Energy Center will serve the public's interests while having *de minimis* impacts on the surrounding environs.

Should you have any questions, please do not hesitate to contact me directly.

Sincerely,

Donald B Kent
President/CEO