



Heal the Bay

1444 9th Street
Santa Monica CA 90401

ph 310 451 1550
fax 310 496 1902

info@healthebay.org
www.healthebay.org

July 14, 2008

Steve Munro, Compliance Project Manager
California Energy Commission
1516 Ninth Street, MS# 2000
Sacramento, CA 95814-5512
Via Email: smunro@energy.state.ca.us

Re: Comments on the “Staff Analysis of Proposed Modifications to the Project Description and Conditions of Certification for the El Segundo Power Redevelopment Project (00-AFC-14C)”

Dear Chair Pfannenstiel and Commissioners:

We respectfully submit the following comments on the Staff Analysis of Proposed Modifications to the Project Description and Conditions of Certification for the El Segundo Power Redevelopment Project (00-AFC-14C). Heal the Bay is supportive of El Segundo’s proposed project amendment to eliminate the use of the antiquated and destructive technology of once through cooling in favor of dry cooling technology at Units 1 and 2.

Multiple federal and state agencies, including the U.S. Environmental Protection Agency (“U.S. EPA”), CEC, OPC, and State Lands Commission (“SLC”), have recognized that once-through cooling (“OTC”) causes significant, ongoing devastation to our valuable marine resources.¹ In June 2005, the CEC released a comprehensive staff report identifying OTC as a contributing factor to the degradation of California’s fisheries, estuaries, bays and coastal waters.²

We are long overdue for the state to embrace a policy on OTC that reflects Californians’ demand for providing the utmost protection for our valuable marine and coastal resources, and for investing in a sustainable, environmentally sound future energy supply. The State is currently developing a final draft of a statewide policy to eliminate the use of once-through-cooling. In the meantime, Heal the Bay is supportive of stations like El Segundo which have decided to move forward independently to a more environmentally sustainable energy supply. We encourage you to continue to show leadership on this issue in the State of California, supporting individual plant transitions to dry cooling as well as a strong State-wide policy.

Thank you for your consideration of our comments.

Sincerely,

Sarah Abramson
Director of Coastal Resources
Heal the Bay

¹ Clean Water Act section 316(b); California Energy Commission, *Issues and Environmental Impacts Associated with Once-Through Cooling at California’s Coastal Power Plants*: Staff Report, 2005; Resolution of the California Ocean Protection Council Regarding the Use of Once-Through Cooling Technologies in Coastal Waters (adopted April 20, 2006); Resolution By The California State Lands Commission Regarding Once-Through Cooling In California Power Plants (adopted April 17, 2006) (“SLC Resolution”).

² California Energy Commission, *Issues and Environmental Impacts Associated with Once-Through Cooling at California’s Coastal Power Plants*, Staff Report. June 2005.