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Kae Lewis, Siting officer  
California Energy Commission  
1515 9th Street  
Sacramento CA 95814

November 14, 2000

Re: Docket#00-AFC-12 MBPP AFC data adequacy

Dear Ms Lewis

Please consider the following in your review of data adequacy for the MBPP AFC.

The Clean Water Act 316 (b) requires that the applicant measure and quantify adverse environmental impacts of the CWIS.

1. If the proposed combined cycle units operate 94% of the time as proposed, the impact of the CWIS must be weighed against PG&E's historical use of the MBPP, not just the last two years of running the old plant full blast. The historical operating data for the MBPP is not included in Duke's 316(b) study plan. This data is essential to quantify adverse environmental impact and a realistic TMDL baseline for withdrawal of water from the Morro Bay estuary.
2. The "Emperical Transport Model" (ETM) proposed to measure entrainment mortality in the MBPP CWIS relies on a grotesque over-simplification of source water behavior in Morro Bay. Tidal currents of up to 6 feet per second streaming by the MBPP effectively divide and isolate source water into two distinct bodies: estuary water whenever the the tide ebbs, and Estero Bay water whenever the tide flows in from the ocean.
3. Duke's 316(b) study plan assumes that the Morro Bay Estuary and a portion of the inner waters of Estero Bay remain a placid, still body of water. The temperature and salinity of this entire volume of water doesn't change, and a uniformly

distributed soup of larval fishes and crabs inhabits this water. This body of water, called the "source water", continuously supplies larval fishes to the MBPP intakes without any perturbation of its density, temperature, salinity or the distribution of ichthioplankton within it. This model is grossly oversimplified.

4. Duke's model of source water overstates the average volume of water in Morro Bay by a factor of 2 and understates entrainment mortality of ichthioplankton which inhabit the estuary by a factor of 4.

A flawed and incomplete assessment of entrainment mortality in Morro Bay represents a large gap in data adequacy for Duke's AFC. The estuary is what Morro Bay is all about.

Thanks for considering these points. I'm looking forward to meeting you when you get to Morro Bay.

Sincerely

Tom Laurie