

ORANGE COUNTY

# COASTKEEPER

EDUCATION / ADVOCACY / RESTORATION / ENFORCEMENT

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July 23, 2006

To: Joanna Reinhardt  
California Energy Commission  
1516 Ninth Street, MS-40  
Sacramento, CA 95814-5512

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| <b>DOCKET</b><br>00-AFC-13C |
| DATE <u>JUL 23 2006</u>     |
| RECD <u>AUG 7 2006</u>      |

Orange County Coastkeeper is a grass roots non-profit organization with a mission to protect and preserve the marine habitats and watersheds of Orange County through education, restoration, policy advocacy, and enforcement. Our interest in this project is to ensure that the marine resources of Huntington Beach are protected using the best available technology to reduce the impacts the AES Huntington Beach Generating Station is having on the coastal environment. We have reviewed the impingement and entrainment report and the staff analysis and have the following comments:

1. We agree with the staff on the finding of significant impacts from the project under CEQA. The assertion by AES Huntington Beach Generating Station (HBGS) that the project does not have a significant impact on coastal resources is not demonstrated by the facts presented in the impingement and entrainment report.
2. On several occasions AES mentions that this license is only for ten years and that five years have already past. With the current power supply situation in California the idea that units three and four may cease operation after the current license period is absurd. Units three and four will likely continue to operate for decades as an integral part of California's power supply. The extension of this license should be considered as part of a long term plan not as a short term project. Additionally the impact of the plant as a whole should be considered, not just units three and four.
3. In the staff analysis mitigation is the only option discussed to deal with the significant impacts of the project, with other options deemed prohibitively expensive and not proved to be effective. In the Proposal for Information Collection (PIC) submitted to the water quality control board AES discusses several technologies as alternatives to the current intake configuration. These along with others including conversion to dry cooling should be looked at seriously. Pilot projects to test different screening systems should be discussed in detail rather than just stating that they are not proven technologies. Additionally any statement that the city will not allow AES to convert to

dry cooling is premature. There is substantial community support in Huntington Beach for eliminating once through cooling at the HBGS.

4. If restoration of the Huntington Beach Wetlands does end up being the selected option for mitigating the significant impacts of the project, a restoration ratio of at least one to one is necessary. The variability of production of natural systems is too great to expect less than that to be adequate. Additionally a long term funding mechanism for the maintenance of the wetlands needs to be worked out. Requiring new negotiations every ten years or a cut off of funding will result in less than adequate performance of the wetlands restoration. Also the dredging of the Talbert Marsh area should not be considered as part of the restoration. Orange County is responsible for the dredging needed and is behind schedule in completing its work. Mitigation funds should go to opening up additional new wetlands rather than completing work already required.
  
5. The staff report does not adequately address the upcoming 316b requirements and the resolution of the state lands commission to phase out once through cooling. As previously stated this project should be looked at for the long term and this license extension should include planning schedules for compliance with the 316b requirements and the elimination of once through cooling at this location.

Thank you,

Ray Hiemstra  
Associate Director-Programs  
Orange County Coastkeeper

# Docket Request Form

Name: Joanna Reinhardt

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