From: Philip Ratcliff
To: opc.comments@scc.ca.gov
Subject: Draft Strategic Plan
Date: Tuesday, September 13, 2011 1:16:04 PM

John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Opc.comments@scc.ca.gov

Re: Strategic Plan

Dear Chair and Members,

I am a Californian who cares deeply about our coast and ocean. I want to thank the Ocean Protection Council (OPC) Members and Staff for working hard to identify critical issues in the Draft Strategic Plan. All of the issues identified in the Strategic Plan deserve thorough and coordinated attention from OPC. However, two issues require OPC's immediate attention: 1) protection of tidal wetlands, and 2) "Ocean Desalination and Once-Through Cooling."

Tidal Wetlands Protection

I am concerned that the protection of tidal wetlands is not adequately addressed in your draft strategic plan. On page 19 of the plan it states: "We decided not to address how tidal wetlands will evolve with SLR, since this issue is being addressed by other state agencies and regional collaborative." However, the OPC is tasked by the California Adaptation Strategy to develop "Decision Guidance," which includes "Allow continuation of important natural processes…and avoid any impacts to neighboring habitats or structures." Therefore, because there is a need for policy to protect tidal wetlands from sea-level rise and because the OPC was tasked in the CAS to develop "Decision Guidance" to provide protection for neighboring habitat, I respectfully call on the OPC to accept responsibility for sea-level rise policy for tidal wetlands in its strategic plan.

Desalinization

Numerous ocean desalination project proponents are applying for permits as we speak. Currently, there is no clear state guidance on the siting and design of the facilities, nor on the technology required to protect marine life from deadly ocean water intakes.

OPC played a critical role in coordinating several agencies to ensure that our coastal power plants could be modernized with cooling technologies that eliminated marine life mortality from "once-through cooling" (OTC). These antiquated systems have already been proven to cause significant harm to marine ecosystems.

Further, we have now identified practices for withdrawing seawater from sub-seafloor intakes as a feasible way to avoid the marine life mortality from "open-ocean intakes" for desalination projects. However, if ocean desalination facilities perpetuate the use of out-dated open-ocean intakes, it would undermine the purpose of OPC's past Resolution on Once Through Cooling and the work by numerous State agencies to protect marine life from this long outdated and destructive process.

I encourage the OPC to immediately undertake work to protect our coast and ocean from proposed ocean desalination facilities. I respectfully request that OPC adopts a Strategic Plan that reflects its commitment to protect our coast and ocean from desalination facilities, consistent with its related work on OTC facilities.

Sincerely,

Philip Ratcliff
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