

Email: People's Moss Landing Desalination Project

To: Linda G. McIntyre, Moss Landing Harbor District
From: George T. Riley, Managing Director, Public Water Now
Subj: NOP, Peoples Desal Project

Comments

1. The SWRCB has adopted regulations concerning the need for a feasibility analysis of subsurface intakes, prior to pursuing an open ocean intake for desal. There needs to be a deep and extensive analysis of this option.
2. The Cal Am project DEIR contains language that slant wells at Moss Landing are not feasible. But other subsurface intakes may be possible. These options need an exhaustive analysis.
3. Is it possible or practicable to have a combined partial subsurface – partial open ocean intake system? If any part of a subsurface intake is financially or environmentally feasible, it will go a long way toward satisfying SWB desires.
4. The use of existing infrastructure, also contained in the SWRCB amendment to the Ocean Plan Amendment, can be assessed in the EIR to show positive tradeoffs for other impacts associated with disturbances required for other intake systems.
5. The EIR should address the history of power plant open ocean intakes as a comparison to the desal potential use. Power plants on the CA coast are required to phase down, if not out, the open ocean cooling facilities, in favor of newer technology for air cooled turbines. But some ocean intake is still required as source water for the cooling liquids. What are these new reduced intake demands? How can these new reduced ocean intakes be compared to use for desal? It will be true that the net reduction in ocean intakes will be substantially reduced from prior years, thus minimizing any desal intake, resulting in a substantial net gain for environmental protections? There needs to be a clear picture of this, in graph form.
6. Any negative impacts of open ocean intake near the Elkhorn Slough will be used against the project. But the impact of the points in #3 above can help negate or mitigate those arguments. The EIR needs to fully explore the offsetting impacts of reduced power plant ocean intake versus some ocean intake for desal.

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