



San Diego County Water Authority

4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

August 29, 2011

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OTHER REPRESENTATIVE

County of San Diego

Honorable John Laird
Secretary, Natural Resources Agency
Chair, Ocean Protection Council
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Comments on Ocean Protection Council Draft Strategic Action Plan

Dear Secretary Laird:

The San Diego County Water Authority is the regional wholesale water supplier in San Diego County, providing water for approximately 3.2 million people. We work in partnership with 24 retail member agencies to ensure a reliable water supply for the region. We appreciate the opportunity to provide comments on the California Ocean Protection Council's (OPC) Draft Strategic Action Plan (2012-2017), released on August 1, 2011 for public review. The Water Authority supports the development of a strategic plan to further the OPC's mission to maintain healthy, resilient, and productive ocean and coastal ecosystems for current and future generations. We, however, have serious concerns about the draft plan's very specific recommendations regarding seawater desalination that are in stark contrast to the general nature of the rest of the document.

Together with our member agencies, the Water Authority is executing a long-term plan to diversify our water supply, including securing reliable imported supplies, implementing aggressive conservation measures, and developing new local supplies, such as water recycling and in the near future, seawater desalination. Desalination holds promise as a new high-quality, locally-controlled drought-proof municipal water supply for the San Diego region. By 2020, we estimate that seawater desalination will provide seven percent of our water supply. In contrast, the current draft strategic plan advocates a policy outcome that would unnecessarily limit access to this key future water supply by prohibiting all ocean intakes for seawater desalination.

Specifically, one of the metrics under Action 9.2.1 recommends adopting a position of no open ocean intakes for seawater desalination facilities, and no co-location with facilities using once-through cooling technology. The draft strategic plan appears to justify this policy position by stating that desalination intakes should be consistent with the State

A public agency providing a safe and reliable water supply to the San Diego region

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Water Resources Control Board's May 2010 executive order for power cooling. However, the Board's policy was intended only to apply to power plant cooling, *not* to desalination. Seawater desalination facilities and power plants that use once-through cooling technologies have very different operational characteristics. An important key difference is that the use of seawater is secondary to the primary purpose of power generation, whereas it is the primary purpose of desalinated water production. This metric should be removed from the plan.

In recognition of the difference between power plant once-through cooling and desalination, the State Water Resources Control Board is conducting a science-based process to develop guidance related to desalination intakes and discharges. The Water Authority is engaged in this state process, along with other agencies pursuing and evaluating seawater desalination as a new water supply. This science-based process is part of a larger effort to consider a potential amendment to the Ocean Plan addressing desalination intakes and brine disposal. We support the State Water Board's efforts to determine if an amendment is needed to augment an already robust permitting process. As it is currently written, the draft strategic plan pre-empts this process by providing policy recommendations on desalination intakes even before the State Water Board's evaluation is completed.

The draft plan also makes a broad and unfounded generalization that desalination intakes using open ocean intakes, including once-through cooling (OTC), will have a major impact on the state's marine life. This statement is not supported by recent local environmental studies. For example, the City of Carlsbad found in its exhaustive environmental impact report on the Poseidon Carlsbad Desalination Project that there was no significant impact on marine life. This desalination project is fully permitted by the San Diego Regional Water Quality Control Board and the California Coastal Commission, including its open ocean intake. Furthermore, evidence from large desalination plants recently constructed in Australia, employing open ocean intakes, show thriving marine environments near the desalination plant intakes. We respectfully request that the statement be removed or modified.

Properly designed open ocean intakes must remain a viable option since not all locations and plant sizes can utilize alternatives such as subsurface intakes. We recommend that the OPC's strategic plan not contain specific siting and design criteria for desalination and not recommend one intake technology over another. Local desalination projects should be designed and configured based on a number of site-specific factors that account for particular characteristics of the area.

Finally, we support making the section on desalination more general in its guidance, consistent with the rest of the draft strategic plan. Seawater desalination is an important

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part of our future water supply reliability, along with conservation and water recycling. As we move forward, we ask that the OPC not limit the range of potential options with respect to desalination. We would like to work with the OPC as a stakeholder to ensure that desalination is implemented in an environmentally responsible and cost-effective manner to meet our region's and California's water supply needs.

Thank you for the opportunity to comment on the Draft Strategic Action Plan. If you have any questions regarding this letter, or would like further information, please contact Bob Yamada, Water Resources Manager, at (858) 522-6744.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping, sweeping strokes that form the name 'Ken Weinberg'.

Ken Weinberg
Director of Water Resources