



September 9, 2011

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

SUBJECT: Ocean Protection Council Draft Strategic Action Plan Recommended Amendments

Dear Secretary Laird:

CalDesal is a nonprofit association of public water agencies and private organizations that promote environmentally responsible water desalination and salinity management. The public water agency members of CalDesal are leaders in water supply management practices that utilize a menu of options to meet the water supply demands of their service areas. Each is unique and best suited to make its own decision about which water supply to pursue and how those projects should be designed and configured based on the unique circumstances of their service area. Each is implementing a diversified water supply portfolio that includes a variety of water supply options that may include a combination of any or all of the following: aggressive conservation, imported water, water recycling, groundwater development and seawater or brackish water desalination.

CalDesal would like to commend the Ocean Protection Council (OPC) staff for an ambitious draft Strategic Action Plan for 2012-2017 dated August 1, 2011. However, we do have several concerns with the Draft Plan and respectfully submit the following comments.

CalDesal's comments are limited to Issue 9: Desalination and Once-Through Cooling. While we appreciate the staff's ambitious five year work plan we are troubled by some of the conclusory remarks in the Issue 9 draft. For example, the last three sentences of the second full paragraph on page 35 conclude that Desalination should be treated consistent with the SWRCB's May 2010 Once-Through Cooling Policy. CalDesal disagrees and submits that there are very important reasons to differentiate desalination from once-through cooling. The Once -Through Cooling Policy does not apply to ocean water desalination intakes. Ocean water desalination facilities and power plants that use once-through cooling technologies have very different operational characteristics. Water intake volumes are substantially less with ocean water desalination. Moreover, the use of ocean water is secondary to the primary use of power production whereas it is the primary purpose for desalinated water production. Ocean water desalination is an important water supply option for local or regional water managers that must be preserved as an option when appropriate for the circumstances. Therefore, we respectfully request that the OPC delete the last three sentences of the second full paragraph of page 35. (See amendment 1 attached).

CalDesal also has concerns with Action 9.2.1, which establishes an OPC measure of success that states: "Take appropriate actions to underscore the need for desalination facility intakes to be consistent with the SWRCB's May 2010 executive order and the OPC's 2006 Resolution to phase out OTC technology." Again, the OTC policy does not apply to ocean water desalination and there are significant operational characteristics that warrant differentiating ocean water desalination from OTC. Therefore, for the same reasons we used in amendment 1, supra, we also submit that Action 9.2.1 and most of its metrics should be deleted and replaced with direction for the OPC to submit input into the development of the SWRCB's pending desalination policy. (See amendment 2 attached).

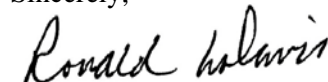
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One metric under Action 9.2.1 that is particularly troubling states: “Position adopted of no open-ocean intakes for ocean desalination facilities and no co-location of ocean desalination facilities using OTC.” CalDesal respectfully submits that the science and technology does not support such a metric and would encourage the OPC not to favor one intake technology over another. Selection of the best technology for each desalination project is dependent on a number of site specific factors. The area’s need for additional supplies will drive the location and size of the project. Site specific issues that will impact the type of intake technology to be employed involve the availability of land, geology, the presence of water bearing materials, water quality and environmental issues. It is important to understand that the use of subsurface beach intakes is limited to areas of suitable geology and environmental conditions and that their yield is limited by the permeability of the offshore alluvial formation. Subsurface intake technology is only one alternative to be considered, but it cannot be used at every location. Other alternatives, such as the use of screened intakes may also have minimal adverse environmental impacts on the marine environment. In particular, this metric should be deleted. (See amendment 2 attached).

The final issue we would like to raise is found in the first metric for Action 9.1.1. That metric would have the OPC staff doing cost- benefit analysis of desalination compared with other water supply options. With all due respect, we do not believe that the OPC staff has the necessary expertise or the resources to perform and be measured by such a metric. This is the purview of each water agency. Under the Urban Water Management Planning Act, each urban agency is to perform such a cost- benefit analysis of various water supply options including ocean water and brackish water desalination. (See Water Code section 10631(i).) CalDesal recommends that the OPC staff review the Urban Water Management Plans of the water agencies if they are interested in such information. For these reasons we submit that this metric should be deleted. (See Amendment 3 attached.)

Thank you for the opportunity to provide comments. If you have any questions relating to CalDesal’s comments, please do not hesitate to contact me at (916) 492-6082.

Sincerely,



Ronald L. Davis
Executive Director

Cc: OPC Members
Amber Mace, PhD, Executive Director, Ocean Protection Council
Samuel P. Schuchat, OPC Secretary, Executive Officer State Coastal Conservancy

Amendment No. 1

Delete the last three sentences in the second full paragraph of page 35 to state:

~~Per the SWRCB's May 2010 policy to phase out OTC at most coastal power plants, most of these cooling systems are scheduled to be decommissioned over the next decade. Therefore, state guidance on siting and design considerations (e.g., alternative intake systems such as subsurface intake methods, improved screening methods, etc. should be consistent with the SWRCB's May 2010 policy and should focus on technologies that can have minimal impact.~~

Amendment No. 2

Delete all of Action 9.2.1 on Page 36:

~~**Action 9.2.1: Take appropriate action to underscore need for desalination facility intakes to be consistent with the SWRCB's May 2010 executive order and the OPC's 2006 Resolution to phase out OTC technology.**~~

~~*Metrics (measures of the OPC's Actions):*~~

- ~~• *OPC input into development of the SWRCB's pending desalination policy.*~~

~~*Metrics (measures of effectiveness)*~~

- ~~• *Position adopted of no open ocean intakes for ocean desalination facilities, and no location of ocean desalination facilities with facilities using OTC.*~~
- ~~• *State's position reflected in the SWRCB's Desalination Policy.*~~

And insert the following to state:

Action 9.2.1: Provide OPC input into development of the SWRCB's pending desalination policy.

Amendment No. 3

Delete the first metric under Action 9.1.1 on page 35 to state:

- ~~• *Regional contexts (costs and benefits of desalination compared with other water supply options; alternative water supply options) analyzed.*~~