



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Office of the General Manager

September 12, 2011

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

Dear Secretary Laird:

Comments on Ocean Protection Council Draft Strategic Action Plan

We have reviewed the Ocean Protection Council's (OPC) Draft Strategic Action Plan (Strategic Plan) and appreciate this opportunity to provide comments. The Metropolitan Water District of Southern California (Metropolitan) supports the OPC's and the Strategic Plan's overall goals of protecting the health of California's ocean and coastal resources.

Metropolitan and its member agencies are statewide leaders in water conservation and wastewater recycling. Our 2010 Integrated Water Resources Plan (IRP - attached) relies on expanding these water stewardship efforts, but also calls for diversifying Southern California's supply portfolio with seawater desalination and other new resources. The IRP includes seawater desalination as part of our long-term adaptive management strategy.

The Strategic Plan proposes several actions which could adversely impact the development of this important new resource. These include: equating seawater desalination with once-through-cooling, banning the use of open water intakes and co-location, dictating how water resources are evaluated at the state and regional levels and setting criteria for how seawater desalination facilities are designed and located. These recommendations have the potential to undermine the State Water Resources Control Board's (SWRCB) Ocean Plan Update regulatory process for seawater desalination and may also interfere with local water agencies ability to plan local water supply infrastructure.

At a recent Strategic Plan workshop, OPC staff announced that the actions for seawater desalination (Issue 9) would be replaced with higher-level policy goals. We support this change and urge the OPC to consider:

1. Informing the SWRCB's Ocean Plan Update process for seawater desalination but not preempting it with pre-determined positions based on once-through-cooling as outlined in Objective 9.2. The SWRCB is developing new regulations for seawater desalination intakes and outfalls based on the best available science and in consultation with numerous stakeholders. This includes convening expert panels and performing related studies. Water agencies are fully

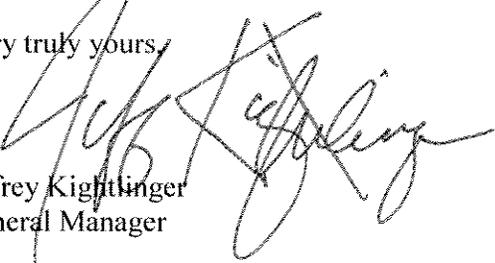
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engaged and participating in the process, including sharing the results of their own numerous pilot and laboratory studies. The actions in 9.2.1 specifically are not consistent with OPC's goal of basing new regulations on sound science.

2. Promoting participation in DWR's Water Plan, but preserving the resource planning and evaluation responsibilities of local and regional water agencies. The actions under Objective 9.1 would require specific cost / benefit analysis and desalination project siting / design standards for local water agency planning efforts. Most water agencies in the state engage in numerous planning processes, including urban water management plans, integrated resources plans, integrated water management plans, master plan studies and related reports. Each agency must account for its unique service area, supply portfolio, geography, population and economy. Resource choices and siting decisions are based on factors including water quality, reliability, supply diversity, distribution system constraints, local uses, regulations, development risk, public acceptance and a host of other factors besides cost. Focusing solely on the cost / benefits of any resource, including seawater desalination, could lead to less robust water planning.

Thank you for considering our comments. Please contact Bob Harding on my staff at (213) 217-6582 or via e-mail at [bharding@mwdh2o.com](mailto:bharding@mwdh2o.com) should you have any questions.

Very truly yours,

  
Jeffrey Kightlinger  
General Manager

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cc: Mr. Ronald L. Davis  
Executive Director  
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