



# San Diego County Water Authority

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January 13, 2012

Honorable John Laird  
Secretary, Natural Resources  
Chair, Ocean Protection Council  
1416 Ninth Street, Suite 1311  
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## RE: Comments on OPC Draft Strategic Plan

The San Diego County Water Authority is the regional wholesale water supplier in San Diego County. Together with our 24 member agencies, we provide a safe and reliable water supply for our region's 3.2 million people. The Water Authority appreciates the opportunity to comment on the revised Draft California Ocean Protection Council (OPC) Five-Year Strategic Plan, released December 15, 2011. Our comments relate to ocean desalination, which is Issue 12 in the draft Strategic Plan. We also provided comments on the OPC's August 1, 2011 version of the Draft Strategic Plan regarding desalination. The revised draft of the Strategic Plan incorporates a number of the Water Authority's comments provided in our August 29, 2011 Letter.

Regarding this revised draft Strategic Plan, we have three key points to bring to your attention for consideration.

### Ocean Desalination Provides a Public Benefit

Our first comment focuses on the value of ocean desalination as a municipal water supply. The draft plan does acknowledge that desalination is considered a local and reliable component of some coastal communities' water supply portfolio. Unfortunately, that limited description does not capture the essential public health and safety benefits that are important to California's economy and jobs. Desalination is a promising new high-quality, locally-controlled drought-proof municipal supply. The draft plan should emphasize the benefit of desalination as a water supply for the public, and we request that the OPC account for these public benefits when balancing potential environmental impacts and desalination.

### Ocean Desalination should be Differentiated from Once-Through-Cooling

The draft Strategic Plan includes discussion on Once-Through-Cooling (OTC) used with powerplants and its relationship to seawater desalination. As we commented in our August 29, 2011 Letter, there are substantive differences between power plant OTC and desalination. Most notably, in the case of powerplants, the use of seawater is secondary to power generation, whereas it is the primary purpose with desalinated water production.

## OTHER REPRESENTATIVE

County of San Diego

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

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January 13, 2012

Page 2

The reference to consistency between desalination and power plant OTC should be eliminated from the final plan.

Cost and Energy Considerations with Ocean Desalination

In the discussion on page 24 of the draft Strategic Plan, it states that seawater desalination has a relatively high cost usage compared with other water sources. In the San Diego region, the cost of seawater desalination is comparable to the cost of other new local supplies. Attached for your information is a September 2010 report to the San Diego County Water Authority Board that addresses the unit cost of new local water supply alternatives. This report, using referenced cost information, shows that the cost of ocean desalination is comparable to other new water supplies for the San Diego region, including recycling, indirect potable reuse and brackish groundwater desalination.

In conclusion, the Water Authority supports the more general nature of the section on seawater desalination in the revised draft Strategic Plan. We agree that potential impacts to the marine life and the environment from seawater desalination should be minimized. However, each desalination project should be evaluated on a site-specific basis, taking into account project location, size, and environmental characteristics. We believe at this stage, it is important not to limit the range of potential alternative technologies available for use with seawater desalination facilities. We would like to continue to work with the OPC as a stakeholder to ensure that desalination is implemented in an environmentally responsible and cost-effective way to meet our region's and California's water supply needs.

Thank you for the opportunity to comment on the latest version of the Draft Strategic 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,



Ken Weinberg  
Director of Water Resources

Enclosure