



January 16, 2012

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

VIA ELECTRONIC MAIL: opc.comments@scc.ca.gov

Re: Comments on the California Ocean Protection Council Revised Draft Strategic Action Plan, Section 12: Desalination

Dear Secretary Laird, Chair and Members of the Ocean Protection Council,

Thank you for providing this new Revised Draft Strategic Action Plan (Revised Plan) and the opportunity to comment. We want to express our support both for staff's effort on this Revised Plan and for the important work and many achievements of the Ocean Protection Council (OPC) since its inception only eight years ago.

As you know, the OPC is charged with the integration and coordination of California's laws and institutions that protect ocean and coastal resources. One of its specific objectives is to:

Provide a set of guiding principles for all state agencies to follow, consistent with existing law, in protecting the state's coastal and ocean resources.¹

¹ Division 26.5 of the California Public Resources Code § 35515 (a).

Given this mandate, we are directing our comments on the Revised Plan to **Section 12: Desalination.**

Ocean desalination is one of the most important issues facing the long-term health of California's coast and ocean resources. It is critical that the OPC demonstrate consistent and immediate leadership on ocean desalination as it relates to once-through cooling (OTC) as multiple state and local agencies and private, for-profit companies are in various stages of permit review for large-scale proposals that will conflict with prior OPC resolutions and existing SWRCB policy on OTC. Undermining existing policy on OTC for ocean desalination projects opens the door to potentially irreversible precedent-setting decisions that will affect the coast and ocean in perpetuity.

The OPC can greatly benefit these agencies, the people of California and the desalination industry by fulfilling its charge of statewide integration and coordination.

Specifically, Objective 12.2 states that the OPC should:

“Work with relevant state agencies to develop policies that are consistent with OPC resolutions related to existing and emerging uses, such as development of a statewide desalination policy that addresses marine intakes, in-plant dilution, and brine disposal.”

As highlighted in the Revised Plan, the OPC's prior Once-Through-Cooling (OTC) resolution is directly related to desalination:

In development of the SWRCB's desalination policy, there is a particular opportunity to consider consistency with the goals to reduce impingement and entrainment that underlie the OPC's OTC resolution and the SWRCB's May 2010 policy.²

It is imperative that policy action on planning Objective 12.2 is taken now.

Therefore, we ask that the OPC take action in an expedited fashion on Objective 12.2 and ensure consistency between its OTC resolution and the State Water Resources Control Board's (SWRCB) May 2010 OTC policy and the development of future policies related to desalination.

Thank you for the opportunity to comment on the OPC's Revised 5 Year Strategic Plan Update.

Sincerely,

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California Coastal Protection Network

Bruce Reznik, Executive Director
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Orange County Coastkeeper

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² Revised Plan, OPC 5-Year Strategic Plan Update, p. 25.

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