

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

January 17, 2012

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

Dear Secretary Laird:

Comments on Ocean Protection Council's Revised Draft Strategic Action Plan

The purpose of this letter is to provide The Metropolitan Water District of Southern California's (Metropolitan) perspective on the California Ocean Protection Council's (OPC) revised draft Five-Year Strategic Plan actions for seawater desalination.

Metropolitan commends the OPC and its staff for conducting the draft review process in an open and participatory manner, as well as for staff's willingness to consider and respond to public comments. We also appreciate that the revised actions for seawater desalination address many of the concerns identified in our comment letter dated September 12, 2011.

Based on our review of the revised draft, there are two additional issues we wish to raise. The first is the continued linkage of seawater desalination to power plant once-through cooling policies. While both utilize ocean intakes, the use of ocean water is the primary purpose for desalinated water production, but a secondary process for electricity generation. Seawater desalination intakes have different design and operating parameters, and typically withdraw less ocean water than once-through cooling systems. In recognition of these important differences, the State Water Resources Control Board is developing regulations specifically for seawater desalination intakes in the Ocean Plan. We urge the OPC to consider separating the seawater desalination objectives from once-through cooling policies, and suggest that the Plan's objectives reinforce the development of science-based desalination-specific regulations instead.

The second issue relates to the description of seawater desalination on page 24, which focuses on high energy use, costs and environmental impacts without describing any potential opportunities or benefits. For Metropolitan and its member agencies, seawater desalination represents a new, locally controlled, high-quality supply, with the potential to increase supply reliability by diversifying both local and regional water resource portfolios.

Our member agencies, in partnership with Metropolitan, are already state leaders in conservation, wastewater recycling, and groundwater recovery. Metropolitan's regional Integrated Resource Plan includes these resources along with seawater desalination as important local supplies that can also

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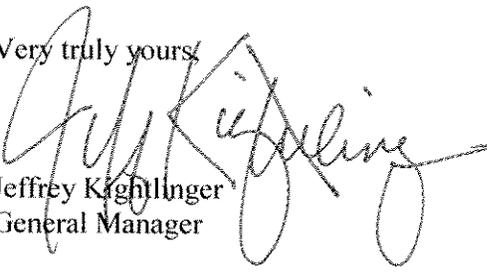
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provide a potential buffer future supply against uncertainties. Additionally, Metropolitan's long-term plan features foundational actions which will position Metropolitan and its member agencies to accelerate seawater desalination development if needed in the future. Seawater desalination is becoming more energy efficient and cost competitive and has important water supply benefits. To provide a balanced description of seawater desalination, we suggest adding a discussion of these benefits to the last two paragraphs on page 24.

Thank you for considering these additional comments. Please contact Robert Harding on my staff at (213) 217-6582 or via e-mail at bharding@mwadh2o.com should you have any questions.

Very truly yours,


Jeffrey Knightlinger
General Manager

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