



Association of California Water Agencies

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January 17, 2012

SUBMITTED BY ELECTRONIC MAIL

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

SUBJECT: Comments on the Ocean Protection Council's Revised Draft Strategic Action Plan (December 2011)

Dear Secretary Laird:

The Association of California Water Agencies (ACWA) appreciates this opportunity to provide comments on the Ocean Protection Council's (OPC) Revised Draft Strategic Action Plan (December 2011). ACWA represents nearly 450 public agencies that collectively provide over 90 percent of the water for agricultural, business and residential use throughout California. ACWA and our member agencies are committed to protecting public health and managing California's water resources in an environmentally sustainable manner. This commitment extends beyond the freshwater system to our estuarine and near-shore water resources as well.

Water agencies are increasingly dependent upon a diversified water supply portfolio that includes local surface and groundwater sources, imported water, increased water conservation, recycling and water reuse, storm water capture, and desalination of brackish water and ocean water sources. Increasingly, California water supply agencies are turning to advanced water treatment methods, including brackish and ocean water desalination to responsibly meet their communities' needs for a locally reliable and cost-effective water supply portfolio.

ACWA appreciates that the OPC has recognized the growing importance of ocean water desalination and the preeminent need for a *science-based policy response* in its revised draft Strategic Action Plan. We believe that that, for the most part, the revised draft Strategic Action Plan frames the issues associated with ocean desalination in a balanced manner. However, we remain concerned that some statements might be interpreted as supporting unnecessary and unfounded barriers to desalination projects that are, and will be, proposed by local communities. These concerns are addressed by comments submitted by CalDesal in its January 13, 2012 letter.

ACWA supports the comments and recommendations provided by CalDesal. Additionally, we wish to underscore the CalDesal comments regarding the way desalination energy costs are characterized in the Strategic Action Plan's "Issue 12" discussion, by drawing to the attention of the OPC and its staff a recent report entitled "Seawater Desalination Power Consumption White Paper", by the WateReuse Association dated November 2011. That report directly addresses the OPC's comment regarding desalination's "...*relatively high cost and energy usage compared with other water sources*" (page 24) and offers the following conclusion:

"SWRO [seawater reverse osmosis] energy consumption can be relatively high compared to many other water treatment methods. However, when considering the total water/energy equation, including intake source, location, distance, and quality, the power numbers can become quite competitive and perhaps even attractive. The added benefit of utilizing a state-of-the-art water treatment method, producing the highest quality drinking water available, certainly helps. In addition, other (alternative) water supplies 1) may be declining; 2) are becoming more impaired and require more treatment; and 3) regulations are becoming more stringent which, in turn, is requiring more treatment of unimpaired surface waters."¹

These considerations are supported by the example offered in the CalDesal letter that shows how two specific desalination projects are *currently* considered cost competitive are in comparison with other new water supply projects in the San Diego region. ACWA recommends that the OPC revise the text of the Strategic Action Plan to better reflect these current conditions.

Thank you for your consideration. On behalf of its members, ACWA looks forward to working with the OPC as elements of its Strategic Action Plan affect the interests of California water agencies and their customers.

Sincerely,



Mark S. Rentz
Director of Regulatory Affairs

¹ Page 16 "Seawater Desalination Power Consumption White Paper", WateReuse Association (November 2011)