



CalDesal

**A Unified Voice for Water
Desalination and Salinity
Management in the Golden State**



July 13, 2015

Ms. Felicia Marcus, Board Chair
c/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

via email: commentletters@waterboards.ca.gov

SUBJECT: PROPOSED DRAFT RESOLUTION TO DELEGATE AUTHORITY TO THE EXECUTIVE DIRECTOR OF THE STATE WATER RESOURCES CONTROL BOARD TO APPROVE MITIGATION MEASURES PURSUANT TO THE WATER QUALITY CONTROL POLICY ON THE USE OF COASTAL AND ESTUARINE WATERS FOR POWER PLANT COOLING

Dear Chair Marcus:

CalDesal would like to express its appreciation for the opportunity to provide comments to the State Water Resources Control Board (Board) on the Once Through Cooling Policy interim mitigation fee.

CalDesal is a nonprofit association of water agencies and other entities that advances the use of desalination and salinity management as important options for local and regional sustainable water supply reliability. While CalDesal has not previously commented on the Once Through Cooling Policy Interim Mitigation fee, we have commented on a similar discussion during the process of amending the Ocean Plan for Ocean Desalination.

Therein on several occasions, CalDesal submitted written and oral testimony that indicated that CalDesal is open to a mitigation fee, but that we believe it is critical that the fee have a direct nexus to the potential impacts of a project and that it should be calculated and applied one time to cover all marine organism mitigation requirements for a project, inclusive of all state permitting agencies. Assuming the Board is able to develop a mitigation fee that CalDesal and other stakeholders can support, CalDesal submits that each desalination project proponent should have the option of paying the mitigation fee or building their own mitigation project or utilizing an existing restoration project.

CalDesal would like to take this opportunity to continue the discussion and encourages the Board to consider a mitigation fee for desalination projects as well as for power plants.

We look forward to monitoring the successful progress of the interim mitigation fee for power plants as a template for a similar mitigation fee for Desalination projects.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Ronald Davis". The signature is written in a cursive, flowing style.

Ron Davis
Executive Director
CalDesal