



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

April 4, 2012

Ms. Joanna Jensen
Environmental Scientist
State Water Resources Control Board
1001 I Street, 15th Floor
P.O. Box 100
Sacramento, CA 95814

Dear Ms. Jensen:

Comments on the Substitute Environmental Document for
the Proposed Ocean Plan Regulations for Seawater Desalination

The Metropolitan Water District of Southern California (Metropolitan) appreciates this opportunity to provide comments on the issues to be included in the Substitute Environmental Document (SED) for the State Water Resources Control Board's (SWRCB) Ocean Plan Update.

Metropolitan and its member agencies are statewide leaders in water conservation, wastewater recycling and groundwater recovery. Our 2010 Integrated Water Resources Plan (IRP) relies on expanding these water efficiency efforts, but also calls for diversifying Southern California's supply portfolio. The IRP identifies seawater desalination as a potential local supply and as insurance that could help manage future uncertainties. Within the context of our long-term plans, seawater desalination is one of the many resource options our region is pursuing to provide reliable high-quality water supplies to our service area.

The comments we are providing for the SED are general in nature, as the recommendations from the three expert panels convened by the SWRCB are not yet available. We would like the opportunity to provide additional comments as information from these expert panels is released.

Scientific Rationale: Metropolitan supports the application of sound science in the development of the new regulations for seawater desalination. We suggest the SED discuss the scientific basis for the proposed intake fee, salinity targets, dilution requirements, monitoring provisions, and other key elements of the proposed regulations.

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Water Agency Studies: The scientific basis should include consideration of the many studies performed by our member agencies and other water agencies. These agencies have completed or are performing intake pilot studies, brine studies, plume modeling, and related analysis. Their study results would have been used to regulate each individual project in the absence of a state-wide regulation, and are therefore relevant to the SED and regulatory process.

Unique Project Characteristics: The SED should account for the fact that each project is unique. This includes distinct differences in site, size, marine environment, subsurface geology, purpose, water supply alternatives, and other factors. We suggest the SED discuss how the proposed regulations account for, and/or impact different types of seawater desalination projects.

We believe the SWRCB can develop regulations that balance protection of the marine environment with the equally important need for the public water supply benefits provided by seawater desalination. To this end, we urge the SWRCB to bring science to bear on striking that critical balance.

Thank you for considering our comments.

Very truly yours,


Jeffrey Kightlinger
General Manager

WAT:tt

cc: Mr. Ron Davis
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