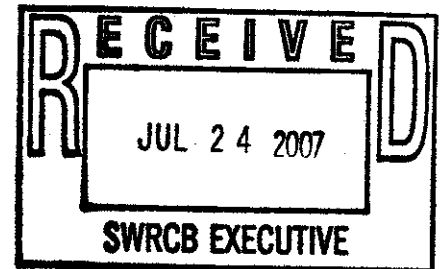




6/26/07 Scoping Mtg.
CA Ocean Plan Amend.
Deadline: 7/27/07 Noon



July 24, 2007

Song Her, Clerk to the Board
Executive Office, Division of Water Quality
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

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Subject: EMWD's Comments on the California Ocean Plan Amendments

Eastern Municipal Water District (EMWD) is pleased to provide comments on the proposed amendments to the California Ocean Plan (COP). EMWD's comments and concerns focus on *Issue 10, Desalination Facilities and Brine Disposal*.

EMWD provides water, wastewater, and recycled water service to over a half of a million people in a rapidly growing region of western Riverside County. While EMWD's service area resides some 50 miles inland, the COP directly impacts its operations. Integral components of EMWD's water supply program include the use of recycled water and desalination of brackish groundwater. Both components are vital to the District-wide salt management plan and both provide the benefit of reducing the region's dependence on imported water.

Meeting regional demands requires an aggressive water recycling program which currently delivers 21,000 acre-feet of recycled water each year and within two years will expand to nearly 30,000 acre-feet per year. Recycling is a vital part of the equation to water reliability, however, in our region recycling must be coupled with salinity management.

At the core of EMWD's salinity management program are desalination facilities which at build out will generate about 4,600 acre-feet of brine each year. Within five years, two energy generation plants will come on-line increasing the total brine produced in EMWD's service area to over 7,000 acre-feet per year. A regional line delivers the brine to a coastal treatment plant where it is treated and ultimately safely discharged into the ocean.

EMWD acknowledged the regional salt management challenges and joined the Southern California Salinity Coalition, an organization focused on addressing salt balance issues and removing salt from local water resources. As stated in the Coalition's latest Strategic Action Plan, salinity is the most under-recognized water-quality problem facing our region. EMWD believes steps must be taken toward resolving this problem, not exacerbate the problem through damaging COP amendments.

For these reasons, **we urge the Board to select Alternative 1. No Action** for California Ocean Plan Amendment *Issue 10, Desalination Facilities and Brine Disposal*. Alternatives number 2 and 3 could negatively impact water recycling, salt management, and brackish groundwater desalination, which are indispensable components of EMWD's balanced water supply portfolio.

EMWD's ability to maintain a sustainable water supply hinges on water recycling and brackish groundwater desalination, which are inseparably linked to the safe disposal of brine. Therefore, we encourage COP policies, like Alternative 1, that do not impede the development and implementation of these crucial water programs. Thank you for your consideration.

Sincerely,

David J. Slawson
President, Board of Directors

Anthony J. Pack
General Manager