ATTACHMENT 1

E-06-013

POSEIDON CARLSBAD DESALINATION

EX PARTE COMMUNICATIONS

Tom Luster

From: Vanessa Miller
Sent: Monday, October 29, 2007 9:03 AM
To: Tom Luster; Jeff Staben
Subject: FW: Commissioner Clark EX PARTE

-----Original Message-----
From: Larry Clark [mailto:forelc@cox.net]
Sent: Sunday, October 28, 2007 7:00 PM
To: Vanessa Miller
Subject: Commissioner Clark EX PARTE

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATION

Date and time of communication: Thurs, September 6, 8 PM
(For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date time of receipt should be indicated.)

Location of communication: Eureka
(For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)

Person(s) initiating communication: Walt Winrow, Peter MacLaggan, Susan McCabe, Nancy Lucast

Person(s) receiving communication: Mike Reilly and Larry Clark

Name or description of project: Carlsbad Desalination Project

Detailed substantive description of content of communication:
(If communication included written material, attach a copy of the complete text of the written material.)

Applicants and their representatives described the proposed full-scale desalination facility for Carlsbad to be co-located at the Encina Power Station.

They described the need for the project as established by the California Department of Water Resources, Metropolitan Water District of Southern California and the San Diego County Water Authority and by their public agency partners (the City of Carlsbad and various water districts) and the public-private partnership approach to project delivery. They described the San Diego region's commitment to a broad array of strategies to lessen the County's dependence on imported water that, in addition to the desalination project, include aggressive pursuit of water conservation and water recycling programs. They explained that the need for the additional water supply is driven by a regional policy initiative aimed at improving supply reliability by reducing the region's dependence on imported water through the development of locally controlled water supplies including expanded water conservation programs, water recycling and the proposed seawater desalination facility. The new water supply would address existing and future water demands within the limits established by approved growth management plans.

Also described were: the environmental effects of the desalination plant before and after the power plant is shut-down; the fact that Poseidon has proposed to continue to operate the intake-outfall mechanism as necessary to run its plant and to fully mitigate for all impingement, entrainment and discharge impacts; scientific studies undertaken to document the project impacts and mitigation requirements; description of the desalination technology to be employed; status and terms of long-term water purchase agreements with public agencies for distribution of the water from the desalination facility; contractual provisions in place to protect public trust resources and maintain traditional governmental oversight of water allocation and use; route of the desalinated water distribution pipeline (only a small segment of which is in the Coastal Zone); public benefits associated with the project, e.g., various public dedications of lagoon and oceanfront property for enhanced public access, restoration and enhancement of marine environment, and an enforceable commitment to long-term stewardship of Agua Hedionda Lagoon for the benefit of marine habitat, public recreation and marine research, etc.

They also described the history of submittal of the application and numerous subsequent requests for additional information regarding the feasibility of alternative subsurface intake structures. They are scheduled for a November public hearing in San Diego.

Larry Clark
Calif Coastal Commissioner

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project , LPC, etc: Poseidon Resources Corporation, Carlsbad Desalination Facility

Date and time of receipt of communication: September 29, 2007; 11 a.m.

Location of communication: telephone call

Type of communication (letter, facsimile, etc.): telephone call

Person(s) initiating communication: Rick Zbur, Latham & Watkins

Detailed substantive description of content of communication:
(Attach a copy of the complete text of any written material received.)

Rick Zbur called me to discuss Poseidon Resources Corporation's Carlsbad Desalination Project. Mr. Zbur informed me about the anticipated schedule for the Project; the Project will come before the State Lands Commission at the end of October and before the Coastal Commission in November of this year. Mr. Zbur said that he would contact me to schedule a more in-depth briefing prior to Coastal Commission hearing in November.

I told Mr. Zbur that I would be interested in understanding more about (1) the implications of the Riverkeeper case on the Project; (2) what the Project impacts would be if the Encina power plant or its once-through-cooling system is retired; (3) Poseidon's plans to mitigate any marine impacts of the Project; and (4) the need for the Project and any potential growth-inducing impacts of the Project. Mr. Zbur responded that Poseidon would be happy to provide an in-depth briefing on those issues, but that Poseidon believes the power plant has minimal impacts and that Poseidon's planned mitigation program will fully mitigate the Project's anticipated marine impacts. Mr. Zbur informed me that Poseidon would discuss these issues in greater detail in our meeting closer to the hearing in November.

Friday, October 12, 2007

RECEIVED
SEP 25 2007
CALIFORNIA
COASTAL COMMISSION

FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATIONS

Date and time of communication: SEP 12-07 4:30PM

Location of communication: S.L.O. CO. GOV. CENTER
(If communication was sent by mail or facsimile, indicate the means of transmission.)

Identity of person(s) initiating communication: POSEIDON RESOURCES WALTER WINROW / PETER MacLaggan NANCY LUCAST

Identity of person(s) receiving communication: COMMISSIONER ACHADJIAN

Name or description of project: CARLSBAD DESALINATION PROJECT

Description of content of communication:
(If communication included written material, attach a copy of the complete text of the written material.)

OVERVIEW OF THE POSEIDON RESOURCES DESAL FACILITY PROPOSED TO BE CO-LOCATED WITH THE EXISTING ENCINA POWER PLANT IN CARLSBAD.
DISCUSSED THE WORKING OF THE PLANT - WHAT HAPPENS TO THE SALT
PROJECT MILESTONES / WATER PURCHASE AGREEMENTS / OTHER PUBLIC AGENCY INVOLVEMENT / BENEFITS TO LOCALS /
THEY PROVIDED ME ~~WITH~~ NAMES OF SUPPORTERS OF THE PROJECT

9-24-07
Date

Signature of Commissioner

If communication occurred seven (7) or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director **within** seven (7) days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

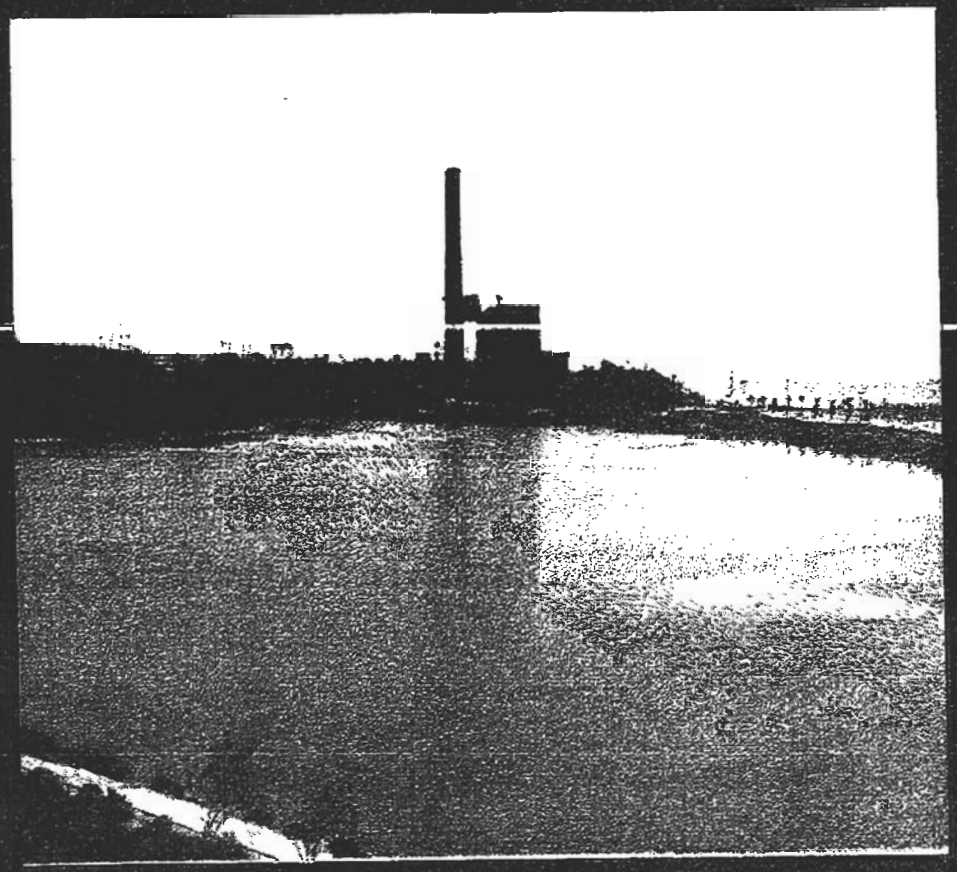
If communication occurred within seven (7) days of the hearing, **complete** this form, provide the information **orally** on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

APPENDIX 2

Carlsbad Desalination Project

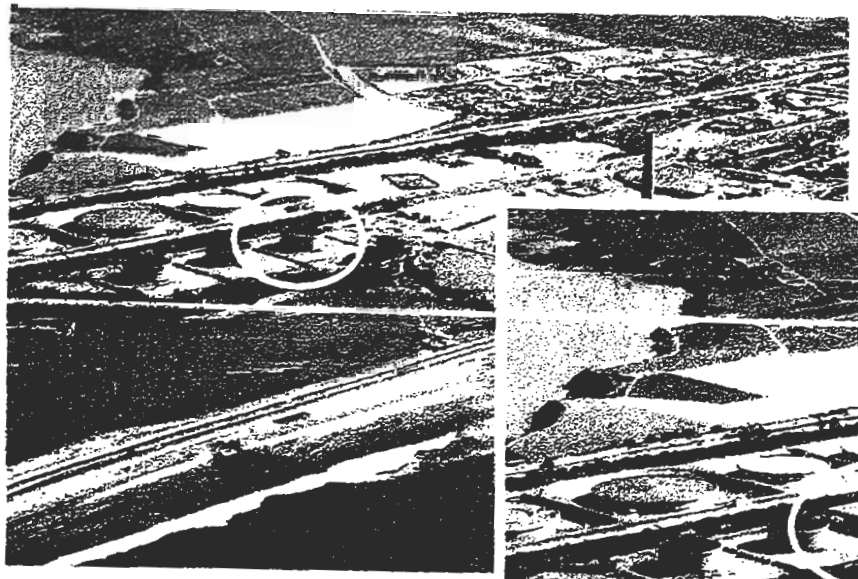
Carlsbad Seawater Desalination Project

Location:	*San Diego County - City of Carlsbad*
Site:	*60-Year Lease With Cabrillo Power*
Estimated Cost:	*$270 Million*
Quantity:	*50 MGD (56,000 AFY)*
Quality:	*High (250 - 350 mg/L TDS)*
Reliability:	*Drought-Proof Supply* *Redundant Capacity*
Price:	*Not to Exceed Imported Water Cost Plus MWD Incentive*
Schedule:	*On-Line 2010*

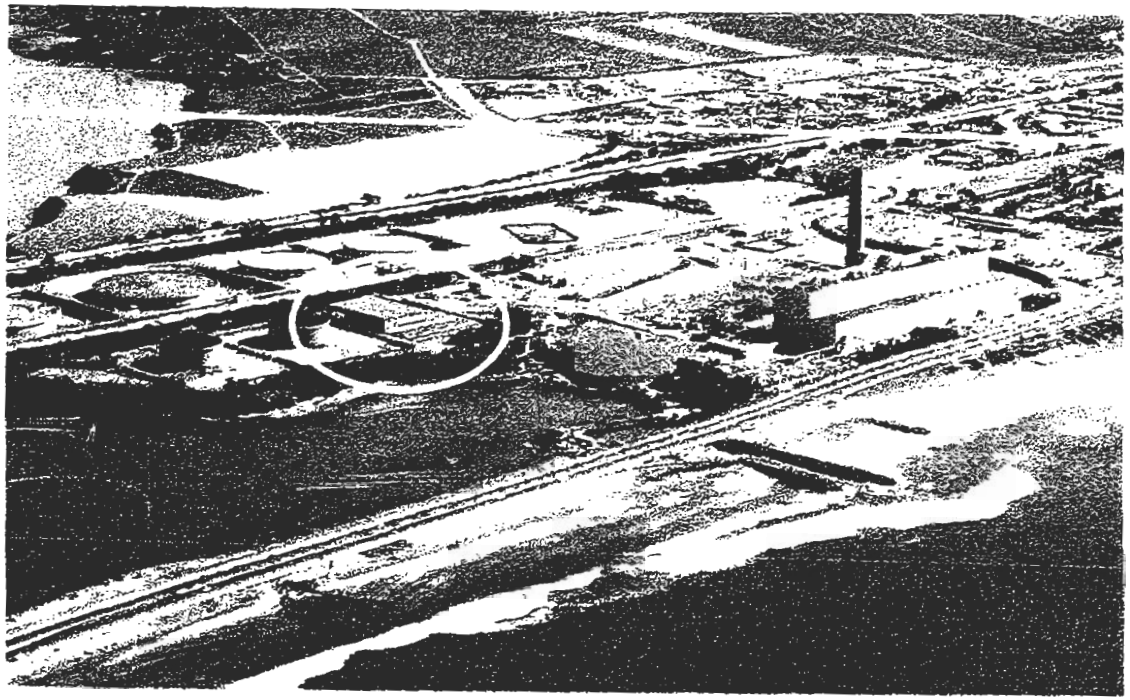


Encina Power Plant in Carlsbad, California

Carlsbad Desalination Project Before & After Simulation

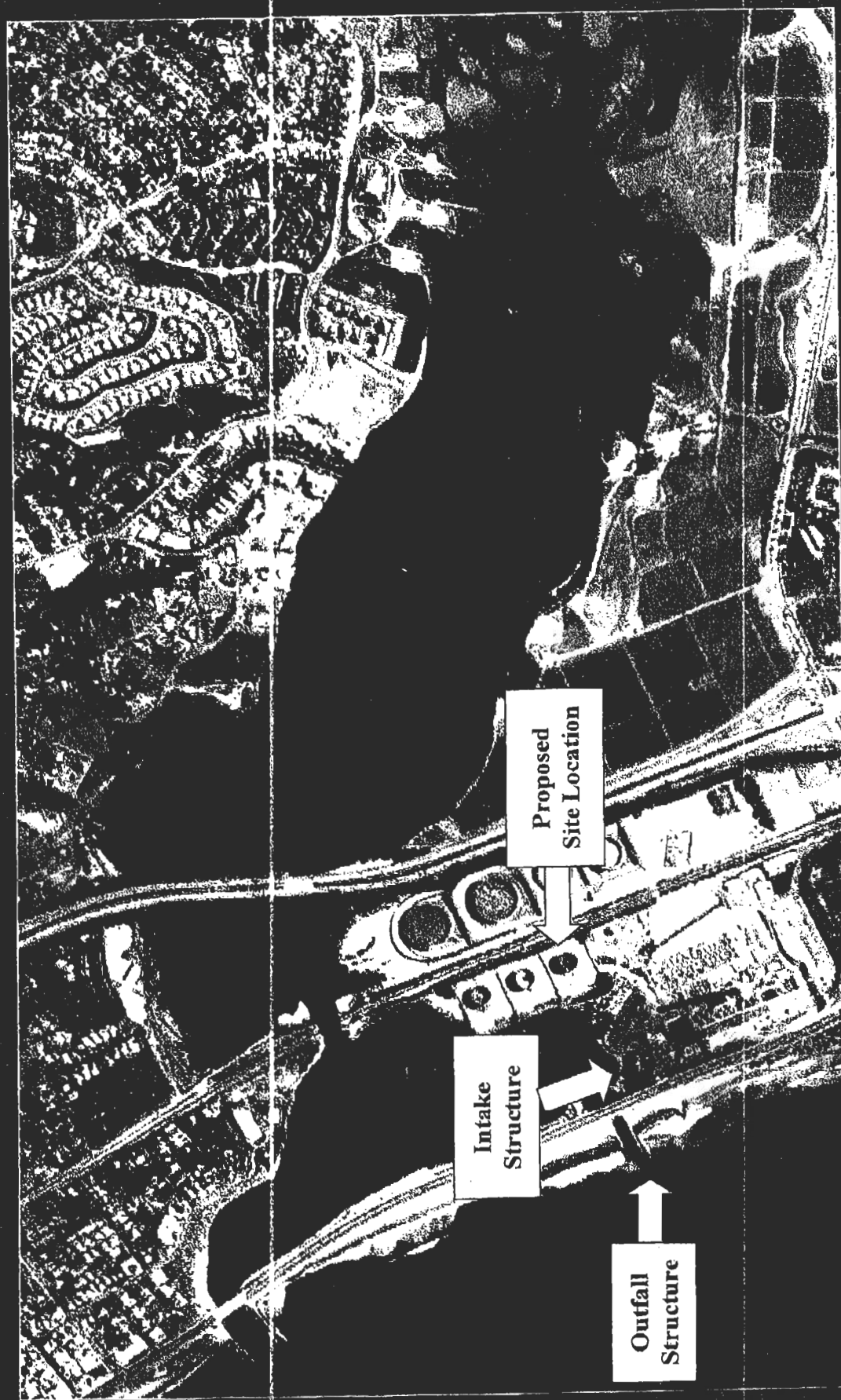


EXISTING SITE CONDITIONS

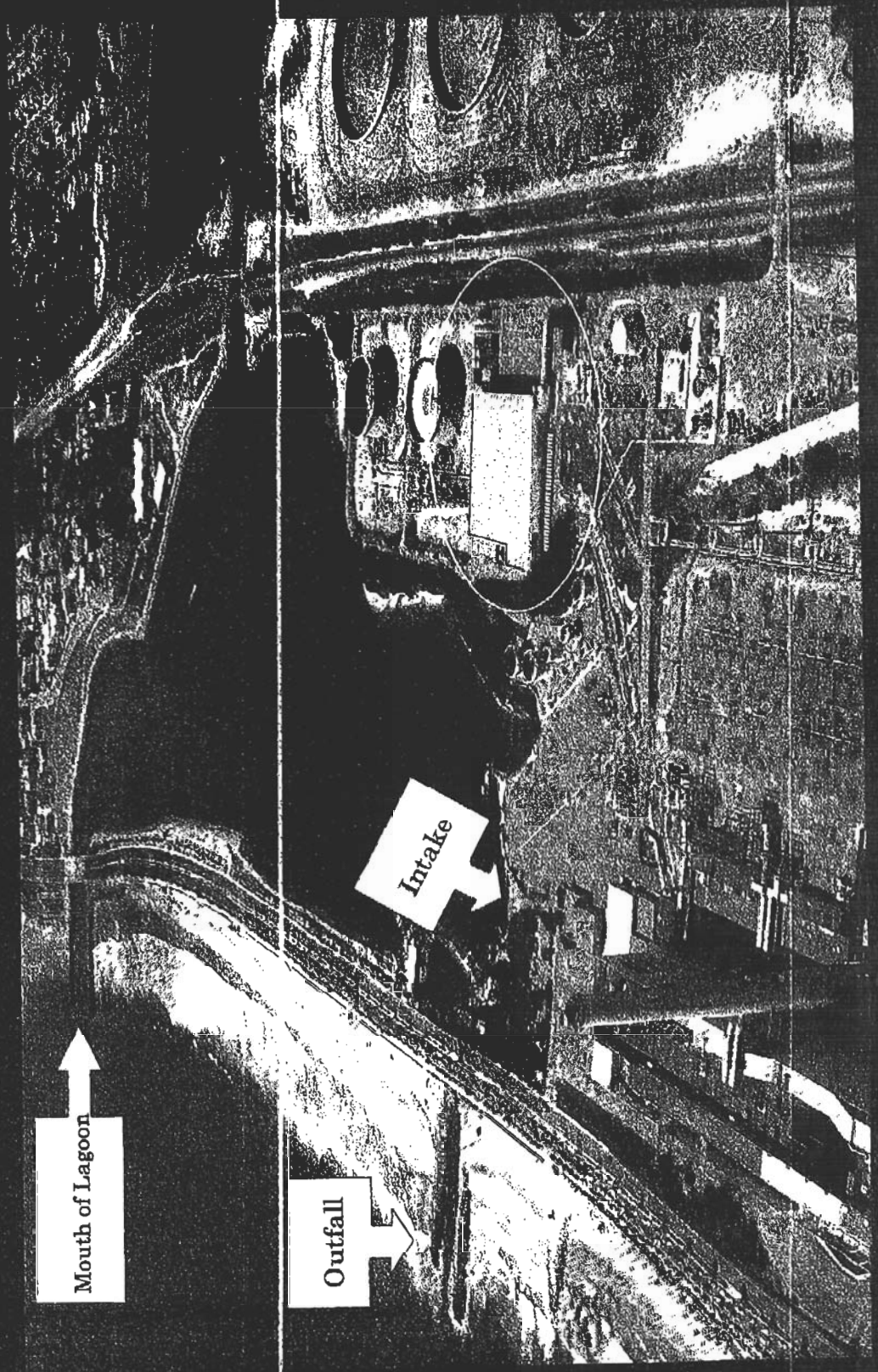


PROPOSED DESALINATION FACILITY AT ENCINA POWER STATION

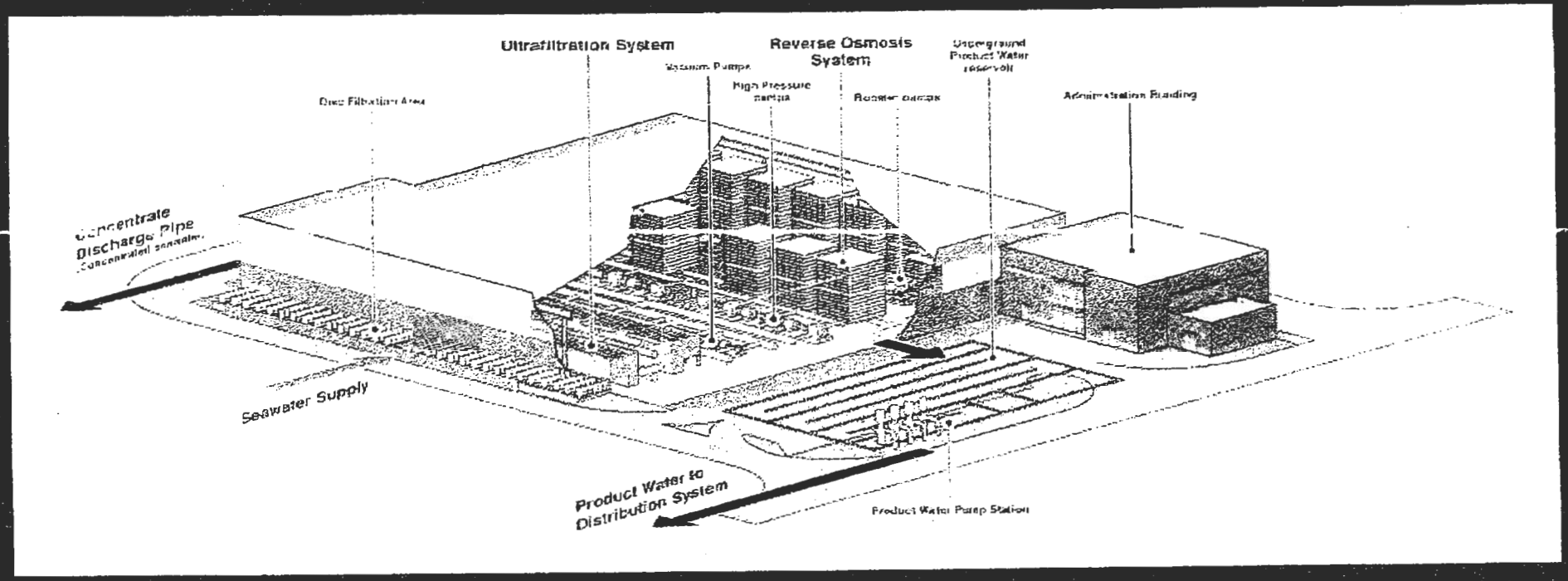
Project Setting



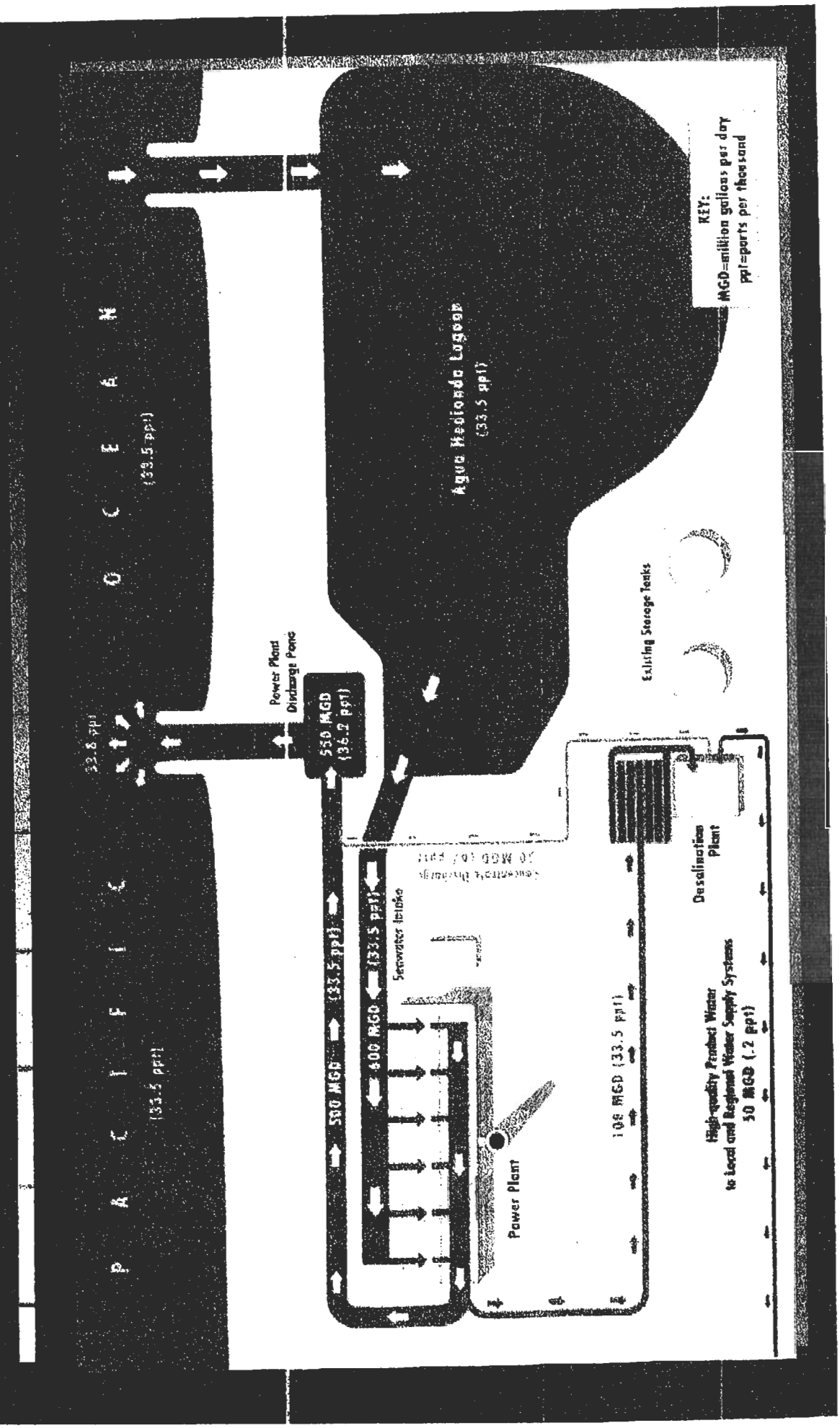
Carlsbad Desalination 50 MGD Project Simulation



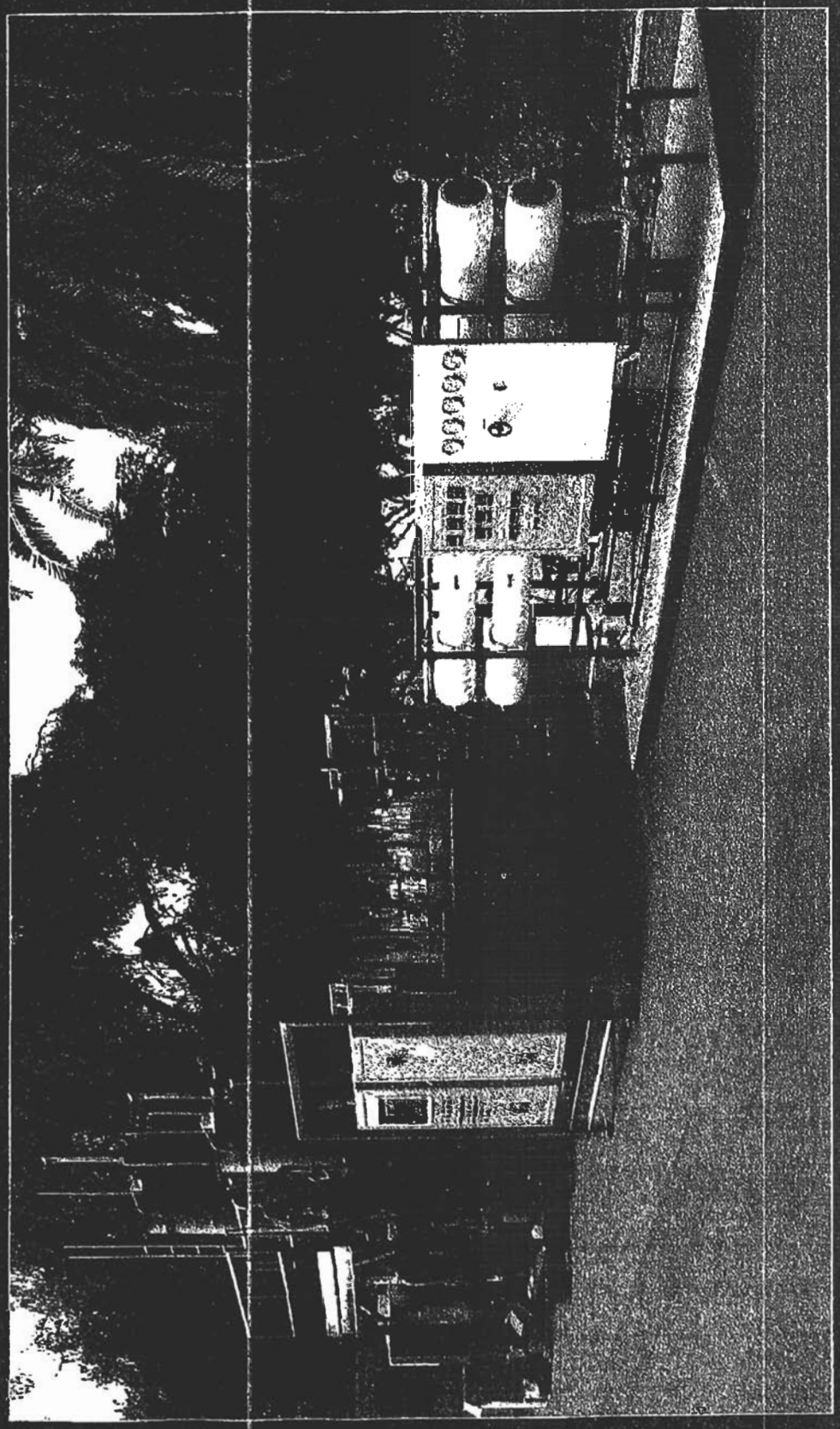
How Does it Work?



What Happens to the Salt?



Demonstration Plant



Project Milestones

- Environmental Impact Report Certified
- Local Land Use Permits Approved
- NPDES Permit Approved
- Drinking Water Permit Approved in Concept
- Coastal Development Permit Under Review
- Long-Term Water Purchase Agreements for 93% of Plant Output

Water Purchase Agreements

	AFY
Carlsbad MWD	22,000
Valley Center MWD	7,500
Rincon del Diablo MWD	4,000
Sweetwater Authority	2,400
Rainbow MWD	7,500
Vallecitos WD	7,500
Santa Fe ID	2,000
Total	52,900

Public Agency Partners' Objectives

- Assign Project Risk to Private Sector
- Control Water Allocation and Use
- Improve Water Supply Reliability
- Enhance Water Quality
- At an Affordable and Predictable Price

Local, Regional and Statewide Benefits

- Reduced Pressure on Colorado River and Sacramento-San Joaquin Delta
- Improved Water Quality
- Environmentally Sensitive Solution
- Strong Public Support
- Economic Development and Job Creation
- $2M Annual Tax Increment for Public Infrastructure in Coastal Zone
- Maintain, Restore and Enhance the Environment and Opportunities for Public Access and Recreation in and around Agua Hedionda Lagoon

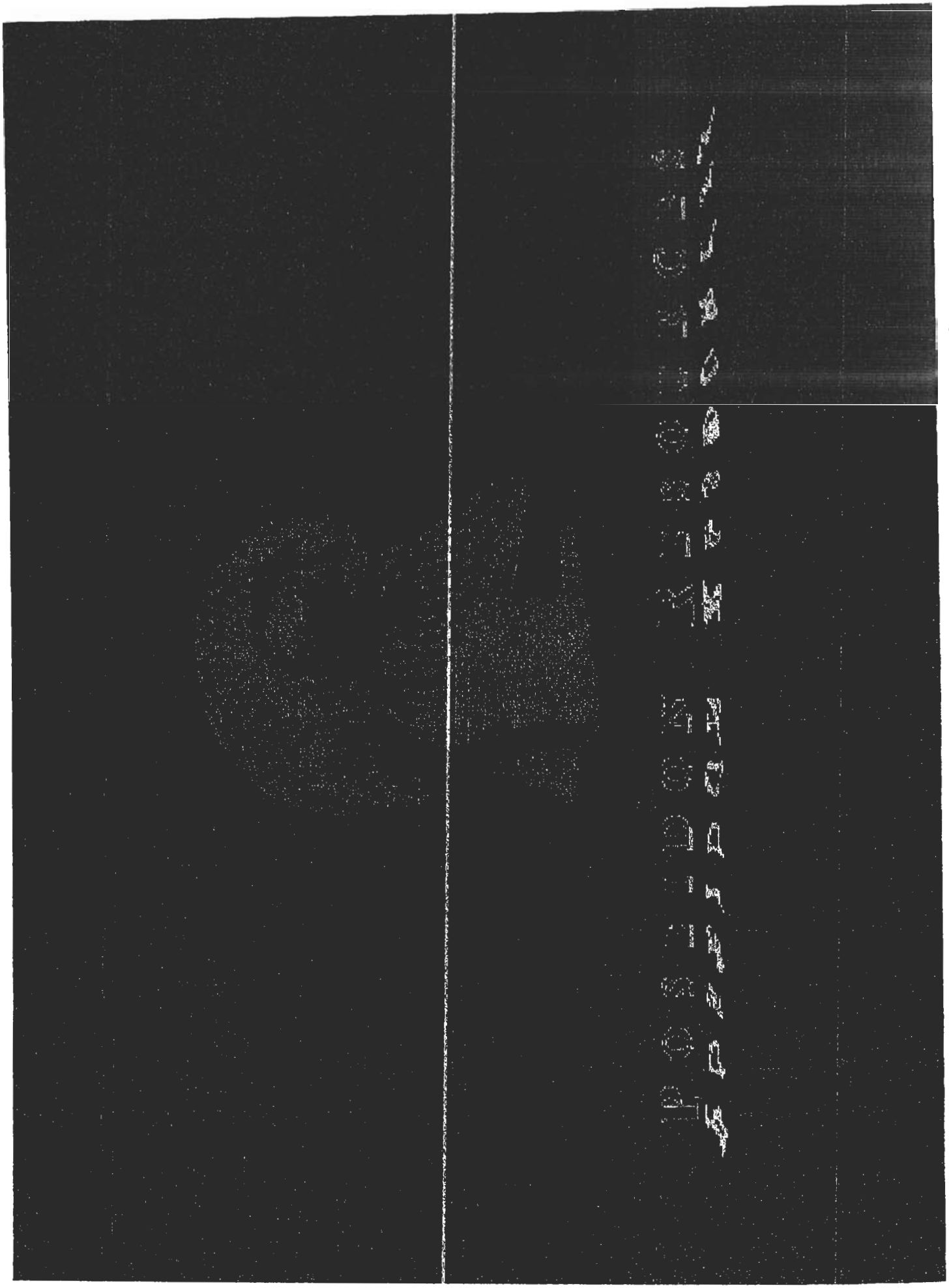
Water Purchase Agreement Terms

- Poseidon
  - Quantity
  - Quality
  - Reliability
  - Price
- Public Agencies
  - Pay for water delivered per specifications

Public Support

The Carlsbad Desalination Project enjoys widespread support including:

- Senator Mark Wyland
- Senator Denise Ducheny
- Senator Dennis Hollingsworth
- Senator Christine Kehoe
- Senator Darrell Steinberg
- Assemblymember George Plescia
- Assemblymember Martin Garrick
- Assemblymember Joel Anderson
- Assemblymember Shirley Horton
- Assemblymember Kevin Jeffries
- Assemblymember Mary Salas
- Assemblymember Lori Saldana
- SD County Water Authority
- City of Carlsbad
- Carlsbad Municipal Water District
- Valley Center Municipal Water District
- Rincon Del Diablo Municipal Water District
- Sweetwater Authority
- Agua Hedionda Lagoon Foundation
- California Chamber of Commerce
- BIOCOM
- California Coastal Coalition
- Carlsbad Chamber of Commerce
- Carlsbad Flower Fields
- Farm Bureau of SD County
- California Water Sports
- Metropolitan Water District of Southern California
- City of National City
- Gemological Institute of America
- Carlsbad Aquafarm
- Grand Pacific Resorts
- Hubbs SeaWorld Research Institute
- Industrial Environmental Association
- SD North Economic Development Council
- SD Economic Development Council
- SD County Taxpayer Association
- SD County Building & Construction Trades Council
- Southwestern Regional Council of Carpenters
- SD Regional Chamber of Commerce
- SD Regional Economic Development Council
- Bristol Cove Property Owners Association



RECEIVED
SEP 28 2007
CALIFORNIA
COASTAL COMMISSION

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATION

Date and time of communication: Thurs, September 6, 8 PM
(For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date time of receipt should be indicated.)

Location of communication: Eureka
(For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)

Person(s) initiating communication: Walt Winrow, Peter MacLaggan, Susan McCabe, Nancy Lucast

Person(s) receiving communication: Mike Reilly and Larry Clark

Name or description of project: Carlsbad Desalination Project

Detailed substantive description of content of communication:
(If communication included written material, attach a copy of the complete text of the written material.)

Applicants and their representatives described the proposed full-scale desalination facility for Carlsbad to be co-located at the Encina Power Station.

They described the need for the project as established by the California Department of Water Resources, Metropolitan Water District of Southern California and the San Diego County Water Authority and by their public agency partners (the City of Carlsbad and various water districts) and the public-private partnership approach to project delivery. They described the San Diego region's commitment to a broad array of strategies to lessen the County's dependence on imported water that, in addition to the desalination project, include aggressive pursuit of water conservation and water recycling programs. They explained that the need for the additional water supply is driven by a regional policy initiative aimed at improving supply reliability by reducing the region's dependence on imported water through the development of locally controlled water supplies including expanded water conservation programs, water recycling and the proposed seawater desalination facility. The new water supply would address existing and future water demands within the limits established by approved growth management plans.

Also described were: the environmental effects of the desalination plant before and after the power plant is shut-down; the fact that Poseidon has proposed to continue to operate the intake-outfall mechanism as necessary to run its plant and to fully mitigate for all impingement, entrainment and discharge impacts; scientific studies undertaken to document the project impacts and mitigation requirements; description of the desalination technology to be employed; status and terms of long-term water purchase agreements with public agencies for distribution of the water from the

desalination facility; contractual provisions in place to protect public trust resources and maintain traditional governmental oversight of water allocation and use; route of the desalinated water distribution pipeline (only a small segment of which is in the Coastal Zone); public benefits associated with the project, e.g., various public dedications of lagoon and oceanfront property for enhanced public access, restoration and enhancement of marine environment, and an enforceable commitment to long-term stewardship of Agua Hedionda Lagoon for the benefit of marine habitat, public recreation and marine research, etc.

They also described the history of submittal of the application and numerous subsequent requests for additional information regarding the feasibility of alternative subsurface intake structures. They are scheduled for a November public hearing in San Diego.

9/24/07 — Date

Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project, LPC, etc.: Carlsbad Desalination Project

Date and time of receipt of communication: June 4, 2007

Location of communication: San Diego City Hall

Type of communication (letter, facsimile, etc.): letter

Person(s) initiating communication: Assembly Member Mary Salas

Detailed substantive description of content of communication:
(Attach a copy of the complete text of any written material received.)

Assembly Member Salas supports the Carlsbad Desalination Project. A copy of the letter is attached.

June 7, 2007
Date

Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0079
(916) 319-2079
FAX (916) 319-2179

DISTRICT OFFICE
678 THIRD AVENUE, SUITE 105
CHULA VISTA, CA 91910
(619) 409-7979
FAX (619) 409-9270

Assembly
California Legislature

MARY SALAS
ASSEMBLYMEMBER, SEVENTY-NINTH DISTRICT

COMMITTEES
CHAIR
VETERANS AFFAIRS
MEMBER
HEALTH
JOBS, ECONOMIC DEVELOPMENT, AND THE ECONOMY
WATER, PARKS AND WILDLIFE

May 31, 2007

California Coastal Commission
Commissioner Ben Hueso
202 C Street 10-A
San Diego, CA 92101

Dear Commissioner Hueso:

I represent the 79th Assembly District for the State of California. My constituents are found throughout San Diego's South Bay community, including the cities of Imperial Beach, Chula Vista, National City, Coronado and San Diego. Unfortunately, the South Bay has not always had access to the same resources, opportunities and services as the rest of the region. As an elected official since 1996, I have worked tirelessly to improve the quality of life throughout my communities.

I am pleased to support Sweetwater Authority, which provides water to thousands of my constituents, in their bid to increase their drought tolerant supplies to 36% by 2010 and become less dependent on imported water. Last year, Sweetwater Authority contracted with Poseidon Resources to purchase 2,400 acre-feet of water annually that will be produced in the Carlsbad Desalination Plant. This water will account for approximately 10% of Sweetwater's annual needs and will supply enough water fro about 4,800 families each year.

I take a personal interest in this, not only because my constituents will benefit directly from this contract, but also because I was a proud member of the Sweetwater Authority Board of Directors when we voted to approve the water purchase agreement with Poseidon Resources last year.

Additionally, this year I have sponsored two bills, AB 1435 and 1521, which deals specifically with water quality and conservation. It is crucial that we have a safe and abundant drinking water supply. I encourage residents and local businesses to conserve water and reduce usage whenever possible. But I know that is not enough in this era of global warming, drought and environmental devastation. A new source of potable water – seawater desalination – is a tested technology that can guarantee San Diego's future water needs are met.

Having participated in the approval of the water purchase agreement, I have first hand knowledge that the water produced by the desalination facility will be of the highest

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quality, meeting or exceeding all drinking water regulatory standards under law. It is also gone through rigorous testing and public scrutiny to ensure that the plant will be environmentally friendly and efficiently operated.

I am proud to support this successful public-private partnership between Poseidon Resources with the City of Carlsbad and I urge the Coastal Commission to approve this project.

Sincerely,

Mary Salas

Mary Salas
Assembly Member, 79th District

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATION

Date and time of communication: **Thurs, May 31, 2007; 10:00 AM**
(For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date/time of receipt should be indicated.)

Location of communication: **K&S Ranch Pescadero**
(For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)

Person(s) initiating communication: **Walt Winrow, Peter MacLaggan, Susan McCabe, Rick Zbur, Nancy Lucast**

Person(s) receiving communication: **Steve Blank**

Name or description of project: **Poseidon Desal project - Carlsbad**

Detailed substantive description of content of communication:
(If communication included written material, attach a copy of the complete text of the written material.)

Poseidon talked about the desalination facility for Carlsbad to be co-located at the Encina Power Station, and said they had a second, similar facility in Huntington Beach which was on the same timeline.

They described the San Diego region's commitment to conservation and recycling strategies to lessen the County's dependence on imported water. They explained that the need for the additional water supply is driven by a regional policy initiative aimed at improving supply reliability while addressing anticipated population growth. They believe this plan falls within the limits established by approved growth management plans and that the plant will not encourage additional growth.

They described their public agency partners (the City of Carlsbad and various water districts) their customers the project (California Department of Water Resources, Metropolitan Water District of Southern California and the San Diego County Water Authority) and the public-private partnership approach to project delivery.

They reviewed Poseidon's briefing packet titled "California Desalination Projects," which they said they provided to the Coastal Commission staff. It covered:

- What they claimed were the environmental benefits of using cooling water intercepted from the existing Encina Power plant discharge; and what would happen to the desalination plant after the power plant is shut-down.

- They said that Poseidon proposed to continue to operate the intake-outfall mechanism as necessary to run its plant and to mitigate for all impingement, entrainment and discharge impacts

- They said there were scientific studies to document the project impacts and mitigation requirements

- They presented the status of long-term water purchase agreements with public agencies for distribution of the water from the desalination facility (it included the Metropolitan Water District)

- They claimed that they had contractual provisions in place that would protect public trust resources and maintain traditional governmental oversight of water allocation and use

- They claimed that their were public benefits associated with the project, e.g., various public dedications of lagoon and oceanfront property for enhanced public access, restoration and enhancement of marine environment

- They said they were offering an enforceable commitment to long-term stewardship of Agua Hedionda Lagoon for the benefit of marine habitat, public recreation and marine research, etc.

Poseidon also described the history of the Tampa Bay desal plant which ran into trouble after Poseidon was bought out of the project. They claimed that Poseidon was absolved from any responsibility/blame in that failure, despite claims to the contrary.

Poseidon offered that there are numerous large-scale desal plants successfully operating throughout the world, including several designed, built, owned and operated by Poseidon and the team it has assembled to engineer and construct the Carlsbad project, and claimed that the technology proposed to be used in its plants is well-tested.

They also described the history of submittal of the application and numerous staff requests for additional information, including asking for plans to build the plant outside the coastal zone and running 48 and 72" pipes up and down city streets.

They expressed some frustration that they cannot seem to satisfy staff's appetite for information necessary to deem the application "complete" and bring the matter to hearing. They are hoping for a November public hearing in San Diego, which is very close to the site.

Monday, June 04, 2007
Date

Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATION

Date and time of communication: (For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date time of receipt should be indicated.)	May 5, 2007; 9:30 AM
Location of communication: (For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)	Carlsbad
Person(s) initiating communication:	Walt Winrow, Peter MacLaggan, Susan McCabe, Nancy Lucast
Person(s) receiving communication:	Pat Kruer
Name or description of project:	Poseidon Desal project - Carlsbad

Detailed substantive description of content of communication:
(If communication included written material, attach a copy of the complete text of the written material.)

Tour of existing pilot desalination facility; description of proposed full-scale desalination facility; description of the public agency partners' need for and interest in the project; environmental benefits of using existing Encina power plant intake and outfall; operational characteristics of the desalination plant after power plant is shut-down; description of desalination technology; status and terms of water purchase agreements with public agencies for receipt of the water from the desalination facility; route of the desalinated water distribution pipeline; public benefits associated with project, e.g., various public dedication of lagoon and oceanfront property for enhanced public access, restoration and enhancement of marine environment, long-term stewardship of Agua Hedionda Lagoon, , etc.

5/5/07
Date

Signature of Commissioner

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If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

Received at Commission Meeting

MAY 0 9 2007

From:

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project, LPC, etc.: Carlsbad Desalination Plant

Date and time of receipt of communication: April 30, 10:00am

Location of communication: San Diego City Admin Bldg
202 C St, 10th floor

Type of communication (letter, facsimile, etc.): Meeting

Person(s) initiating communication: Scott Maloni, Peter MacLaggan and Walt Winrow

Detailed substantive description of content of communication:
(Attach a copy of the complete text of any written material received.)

The proponents of the desalination project described the history and benefits of the proposed project. They explained that they were committed to dredging and maintaining the lagoon if and when the power plant should cease to operate. They pointed out the importance of this to the hatcheries, other businesses and ecology of the lagoon. They discussed the large scope of the project and some detail of the agreements they have already entered with agencies that are committed to purchasing the water. Finally they described that they are assuming all of the financial risk of the project, taking that burden away from the public.

April 30, 2007
Date

Signature of Commissioner

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If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

Received at Commission Meeting

MAY 0 9 2007

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATIONS

From:

Name or ~~description of~~ project, LPC, etc.: Carlsbad Desalination Plant

Date and time of receipt of communication: April 5, 2007

Location of communication: 7 [illegible] SD 92101

Type of communication (letter, facsimile, etc.): letter

Person(s) initiating communication: James C. Schmidt

Detailed substantive description of content of communication:
(Attach a copy of the complete text of any written material received.)

letter attached

May 3, 2007
Date

Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

JAMES C. SCHMIDT

8383 Center Drive, Suite J, La Mesa, CA 91942
Office Phone · (619) 469-4641
Office Fax · (619) 469-5927

Alonso

The Honorable Ben Hueso
Member of City Council
City of San Diego

April 3, 2007

Dear Ben:

I was very pleased to see that the Speaker appointed you to the Coastal Commission. This is a major plus for the San Diego Region.

A key issue for San Diego is the long planned Carlsbad desalination plant which is before the Coastal Commission this year. The Coastal Commission is the final approval as I have learned that all other governmental approvals have been completed.

The high probability that San Diego is going to face more and more water problems, and being at the end of the line in California, has really brought back to me my past water problem experience in Monterey. Enclosed is my recent January 30 Transcript article on desalination which discusses key issues and some historical water problems. Also enclosed are the U-T March 24 article on stopping the pumping of delta water and the March 31 L.A.Times article on a possible drought.

My personal water problem experience in Monterey, mentioned in my article, and tales I have been told by several old friends who went through Santa Barbara's severe problems, really stick in my mind. What would happen if we in San Diego were not allowed to water our lawns like what happened in Santa Barbara? A company that sprayed lawns green made a lot of money. How about our golf courses that do not use well water, which also can have problems? Experts tell me that San Diego could face similar situations and well water could also have problems.

The bottom line is that San Diego needs more and more water as we continue to grow with the continual increases of births over deaths being a very major reason for San Diego's growth. The Coastal Commission's approval of the Carlsbad plant is badly needed.

Also I hope that you and Chairman Kruer can get the Commission's hearing to be in San Diego so the Commission can directly receive San Diego's input concerns without having to attend a meeting somewhere else. Since the Carlsbad plant is a San Diego issue, the hearing should be in our County.

Sincerely, thanks for listening and also thanks for listening to me when I appear at the City Council on important civic issues,

Jim Schmidt
James C. Schmidt

The Daily Transcript

OPINION & COMMENT

The Daily Transcript

Founded April 3, 1886

www.sddt.com

ROBERT L. LOOMIS, Publisher

George Chamberlin, Executive Editor

Joseph Guerin, Editor

Desalination of seawater for San Diego's needs looms

Guest Commentary
By Jim Schmidt

The Carlsbad Desalination Plant is a partnership between Poseidon Resources and the city of Carlsbad to build the plant and provide seawater as an additional source of water for San Diego County use. In recent years, San Diego has come very close to experiencing water problems with droughts that affected water reservoirs, leaving them nearly dry.

Simply put: The availability of more water sources to support San Diego's population growth is vital.

Former Gov. Pat Brown pushed for the approval of the State Water Project in the 1960s, and now California is fortunate that Gov. Arnold Schwarzenegger is taking a lead role to support the water needs of the state's population. The public is finally starting to realize the urgency of having adequate water supply for our citizens- it is a "must" for San Diego.

It is great news the Poseidon project has obtained all necessary state and local governmental approvals — except from the Coastal Commission, which has the final approval. The commission is set to hold a hearing soon, and with its consent, Carlsbad will house the new desalination plant that will provide at least 10 percent of the region's water needs.

Sweetwater Authority, which serves approximately 180,000 people in National City, Bonita and parts of Chula Vista, has reached an agreement with Poseidon to purchase water when the plant is up and running. Finding additional sources of water is crucial for the San Diego area. We can't always rely on current sources such as the Colorado River and the State Water Project since San Diego is at the end of the line.

I have seen how a severe drought can change a landscape. About 30 years ago, I was playing golf in Monterey, Calif. Monterey was not included the State Water project, nor could it capture water running through the Carmel Valley. The golf course's water capabilities were limited; only a 7- or 8-yard strip of grass in the middle of each fairway, other than the greens, could be watered. (It was so bad that even the men's room had a sign above the urinals that read: "Do not flush.")

Santa Barbara has also experienced severe water problems. Several times residents were not allowed to water their grass, and some of my friends living in the area told me they paid a company to spray their lawns green. Surely enough, the company made a lot of money.

There is no need for San Diego to be in a position where citizens cannot water grass at their homes or businesses. Many golf courses here would have to confront the same problems Monterey and Santa Barbara faced. We need every possible source of water to protect our beautiful San Diego region.

Proper planning and local leadership can lead the way to make desalination a viable source of water for our citizens. Remember: We need water to fight fires, which unfortunately have become a way of life in our county because of a period of minimal rainfall, with almost none between May 1 and Nov. 1, 2006.

Let's hope and pray the Coastal Commission recognizes the urgent need to protect the San Diego area by approving the Poseidon project in Carlsbad. We need to have more sources of water to meet our growing population and business needs.

Schmidt is a retired banker and attorney and served in three positions in state government as Ronald Reagan's appointee. He is currently active in civic organizations and transportation, housing and sports. He serves on four public boards. Send comments to editor@sddt.com. All letters are forwarded to the author and may be published as Letters to the Editor.

Source Code: 20070129tza

ATTACHMENT 2

E-06-013

POSEIDON CARLSBAD DESALINATION

CORRESPONDENCE:

- ELECTED OFFICIALS
- ORGANIZATIONS
- INDIVIDUALS

ELECTED OFFICIALS

City of Carlsbad
Office of the City Council

This letter has been sent to the Coastal Commission members and all staff members.

October 19, 2007

RECEIVED
OCT 29 2007
CALIFORNIA
COASTAL COMMISSION

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Coastal Development Permit Application No. E-06-013 for the Carlsbad Desalination Plant

Dear Mr. Kruer,

On behalf of the City Council of the City of Carlsbad, I submit this letter to you in support of the Carlsbad Desalination Project.

For Carlsbad, the seawater desalination plant represents a water supply, water storage and environmental preservation project. Each of these benefits alone warrants approval of the project. Taken collectively, the facility could be the single most important infrastructure project in our City's history.

The City of Carlsbad has been working with Poseidon Resources since 1998 on a public-private partnership that will provide the City of Carlsbad its entire daily requirement for water, up to 25 MGD. Acting as the lead agency for this project, we certified the projects Environmental Impact Report and imposed development conditions that ensure the project is built with the long-term interests of the City and its coastal zone in mind.

The Carlsbad Municipal Water District (CMWD) is a subsidiary district of the City of Carlsbad. CMWD's service area covers approximately 85 percent of the City and delivers over 21,000 acre feet of water annually to 83,000 people. CMWD currently purchases 100% of its water as treated water from the San Diego County Water Authority (CWA).

Our imported water delivery system is not 100% reliable and environmental impacts to the Bay-Delta and Colorado River are restricting – and will continue to restrict - our water supplies. This is why Carlsbad works in partnership with CWA to provide educational and effective conservation programs to our customers. We also made an investment many years ago in an aggressive water reclamation program. Today, 20% of Carlsbad's water supply consists of reclaimed water - more than any other water district in the region.

But reclamation and conservation are not enough to ensure our residents have a reliable water supply. Seawater desalination offers San Diego County the most immediate and viable opportunity to guard against the reduction of imported water supplies.

The City of Carlsbad conducted an extensive due diligence process before entering into a water purchase agreement with Poseidon Resources. We researched every potential environmental,

1200 Carlsbad Village Drive • Carlsbad, CA 92008-1989 • (760) 434-2830 • FAX (760) 720-9461

economic, and social impact of the project. We intentionally located the desalination project next to the power plant and Agua Hedionda Lagoon because it is the most cost-effective and environmentally-beneficial location.

In 2006, Carlsbad certified the Environmental Impact Report for the desalination plant. The city concluded there are no significant, unavoidable impacts for both the construction and on-going operation of the plant related to thirteen different areas studied, including water quality. In fact, the public review period of the environmental process extended over a 396-day period, almost an entire year longer than required under California environmental law, and included extensive input from a wide range of community, environmental, scientific, business and regulatory organizations.

We have long anticipated that the desalination plant would outlive the Encina Power Station. Consequently, the EIR specifically analyzed a 'no power plant' scenario, which demonstrated that the desalination plant can be operated in an environmentally responsible manner regardless of whether or not the adjacent Encina Power Station is fully functioning.

Of great importance to the City and its residents , when the power plant is decommissioned, Poseidon Resources will assume responsibility for dredging the lagoon, making the operation of the desalination facility crucial to the long-term health of the lagoon's 388-acre ecosystem. The Agua Hedionda Lagoon is one of our city's environmental and recreational treasures and its long-term sustainability is important to our citizens' quality of life.

For Carlsbad, the desalination plant represents our future water supply, water storage and the environmental preservation of one of our greatest assets – the Agua Hedionda Lagoon. It's a facility that the County Water Authority and its member agencies are also counting on as part of their effort to diversify the region's water supply.

The time to act is now. Any unnecessary delay to this project will only exacerbate the long-term impact of supply cutbacks and water rationing. On behalf of the City of Carlsbad, I respectfully request that you approve this project.

Thank you,

Bud Lewis

MAYOR CLAUDE A. "BUD" LEWIS
Mayor

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke

Secretary Mike Chrisman
Director Lester Snow
Senator Dennis Hollingsworth
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Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President Pro Tem Don Perata
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas
Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Congress of the United States
Washington, DC 20515

October 2, 2007

This letter has been sent to all members of the Coastal Commission and all staff members.

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

The San Diego County congressional delegation urges the California Coastal Commission to approve the Carlsbad Desalination Plant's Coastal Development Permit.

The Sacramento San Joaquin Bay Delta and the Colorado River provide San Diego County with over 85% of the region's water supply. Longstanding regulatory and environmental constraints on these two primary water sources are resurfacing and will have an immediate and long-term impact on the health and wellbeing of San Diego and its economy.

The Coastal Commission's approval of the Carlsbad Desalination Plant will allow San Diego County to pursue a water diversification strategy that complements conservation and reclamation efforts that have been underway for many years. The Metropolitan Water District, San Diego County Water Authority and local public water agencies have all identified the desalination plant as a regional solution to San Diego County's water needs. As part of a broader diversification strategy, the plant will help relieve pressure on an imported water delivery system that is increasingly fragile.

Today, there are 21,000 desalination plants producing 3 billion gallons of drinking water a day in 120 countries around the world. Aided by technological advancements, seawater desalination is progressively more cost-effective and environmentally feasible. Recognizing the potential benefits of water demineralization, the United States Congress has utilized the Water Desalination Act of 1996 as a vehicle to assist in research and development, environmental and feasibility studies and the preliminary engineering of desalination facilities around the country.

The Carlsbad desalination plant is a critical component of the region's water infrastructure, providing San Diego County with 50 million galloon per day of water that is locally–controlled and drought proof. The Project has undergone almost a decade of planning and research to ensure that it is an environmentally responsible solution to the region's water needs.

The water supply and environmental benefits associated with this project merit the approval of the Coastal Commission. Thank you for your attention to the serious water supply challenges confronting of San Diego County and for your support for the Carlsbad Desalination Plant.

PRINTED ON RECYCLED PAPER

Sincerely,

Brian P. Bilbray
Member of Congress

Duncan Hunter
Member of Congress

Darrell Issa
Member of Congress

Bob Filner
Member of Congress

Susan Davis
Member of Congress

cc:

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
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Commissioner Dan Secord
Commissioner Adi Liberman
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Senator Denise Ducheny
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Martin Garrick
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Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones
Secretary Mike Chrisman

BILL HORN

SUPERVISOR, FIFTH DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

October 2, 2007

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project - This letter has been sent to all members of the Coastal Commission and all staff members.

Dear Chairman Kruer:

I am writing to urge you to support the Carlsbad Desalination Project. A large portion of the district I have been elected to represent will benefit directly from the construction of the desalination facility.

San Diego County imports more than 85% of its water from the Colorado River and State Water Project, and the County's imported water supplies are threatened by environmental and legal constraints. Record-setting drought conditions in Southern California and along the Colorado River, and the pending court-ordered shutdown of the State Water Project pumps could reduce up to 30% of San Diego County's imported water supply.

The San Diego County Water Authority's 2005 Urban Water Management Plan is designed to protect the County against drought conditions and disruptions to the region's imported water supply, and therefore identifies a need for 56,000 acre-feet-per-year of desalinated seawater by 2011. The Carlsbad Desalination Project will provide the region with 50 million gallons per day (56,000 acre-feet-per-year) of high-quality, environmentally-sensitive drinking water.

The San Diego County Water Authority has approved a resolution in support of the Carlsbad Desalination Project, and has identified the desalination plant as a critical component of the region's water diversification strategy. Consequently, nine San Diego County public water agencies – Carlsbad Municipal Water District, Valley Center Municipal Water District, Rincon del Diablo Municipal Water District, Sweetwater Authority, Rainbow Municipal Water District, Vallecitos Water District, the Santa Fe Irrigation District, Olivenhain Municipal Water District and the Oceanside Municipal Water District - have entered, or are negotiating, long-term purchase agreements to receive desalinated water from the Carlsbad desalination plant.

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470
☎ (619) 531-5555 • FAX (619) 685-2555 • bill.horn@sdcounty.ca.gov

This broad interest from the public water agencies is clear evidence that every drop of drinking water that this project can produce is essential to San Diego County's economic stability and public health.

I hope you will approve this project without further delay.

Sincerely,

The Honorable Bill Horn
San Diego County Board of Supervisors

Cc

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
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Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
Senator Tom Harman
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Mimi Walters
Assemblymember Martin Garrick
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Assemblymember Mary Salas
Assemblymember Bob Huff
Assemblymember Jim Silva
Assemblymember Van Tran
Assemblymember Chuck DeVore
Assemblymember Todd Spitzer
Assemblymember Mike Duvall
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Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

September 26, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project
(Please note: This letter has been sent to all Coastal Commission members and staff.)

Dear Commissioners:

We are jointly writing to you again in support of the Carlsbad Desalination Project – a critical component of our region's water supply portfolio. Since our last correspondence in April, San Diego's imported water supplies have come under increased pressure, highlighted by the recent federal court ruling impacting the Sacramento San Joaquin Bay-Delta. We have attached several recent news articles that amply demonstrate the urgency of this issue in our region.

It is well known that approximately 85% of the water consumed in San Diego County is imported from the Colorado River and Northern California. About 40% of our imported water comes from the State Water Project and the remaining supply from the Colorado River. Currently, the Colorado River is suffering through a prolonged drought - water run off has been below normal for the past 8-9 years - and the Sierra snow pack is at 38% of its normal level this year, meaning we can expect less water runoff into the State Water Project.

Compounding our regional troubles, 2007 has been the driest year in Los Angeles history, dating back over 120 years, and San Diego County is mired in the driest two consecutive years in its history. Scientists are predicting that climate change may have dire impacts on California's hydrology and on the State Water Project and Colorado River.

The tipping point could be the federal court ruling that the pumps sending water to 25 million Southern Californians be shut down in an effort to protect the endangered Delta Smelt. The region is bracing for the impacts of this decision, which could potentially result in the loss of up to 30% of the water pumped from the Bay-Delta to Southern California. The Metropolitan Water District has already put San Diego agricultural water users on notice that on January 1st 2008 they can expect a 30% cut back in water supply. These cuts backs could easily be extended to municipal users in the near future.

Together, these broad threats – legal, regulatory and environmental – to our imported water supplies are creating a crisis scenario that must be addressed immediately. The severity of our situation cannot be understated, which is why local water supplies must be developed to augment on-going conservation and water recycling measures.

The last time we wrote, six San Diego County public water agencies had joined the Carlsbad Desalination Project's public-private partnership. Today, seven public water agencies have entered, and two are negotiating, long-term purchase agreements to receive desalinated water from the Carlsbad desalination plant, and now the plant's 50-million-gallons-per-day (MGD) capacity is fully subscribed.

We hope the urgency of this letter resonates with you as you consider approval of the Coastal Development Permit for the Carlsbad Desalination Project. Our region cannot afford to wait any longer to secure a reliable, local water supply that helps reduce our dependence on imported water. We urge the Commission to approve the Carlsbad Desalination Project at its first opportunity in November.

Sincerely,

The Honorable Claude A. "Bud" Lewis
Mayor, City of Carlsbad

Mr. Gary Broomell
President, Valley Center Municipal Water District

Mr. R. Mitchel Beauchamp
Board Chairman, Sweetwater Authority

Mr. Robert "Bud" Irvin
President, Santa Fe Irrigation District

The Honorable Jim Wood
Mayor, City of Oceanside

Dr. Hanno E.G. Ix
President, Rincon del Diablo Municipal Water District

Ms. Susan J. Varty
President, Olivenhain Municipal Water District

Mr. Rua M. Petty
President, Rainbow Municipal Water District

Darrell W. Gentry

Mr. Darrell Gentry
President, Vallecitos Municipal Water District

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Attachments:

THE CALIFORNIAN
NC TIMES
AN EDITION OF NORTH COUNTY TIMES
NORTH COUNTY TIMES

September 25, 2007

Securing Southern California's water future

By: LESTER SNOW - Commentary

Last week, Gov. Schwarzenegger introduced a $9 billion water bond package to help address California's water crisis and ensure clean, safe water for generations to come. With our rapidly growing population, drought conditions in many parts of the state, a changing climate and an aging water system, now is the time for leadership and bold action.

The governor's plan allocates more than $5 billion to build new above- and below-ground surface storage. In addition to providing reliable water supplies, these facilities also address a broad range of public benefits including habitat and restoration needs, in-stream flows and river temperature requirements, flows to manage Delta salinity, management of the timing of diversions from and releases to rivers and streams, effective conjunctive use of surface and groundwater, and flood management.

The governor's plan also addresses the problems in the Delta head on and provides a foundation for improved water conveyance through or around the Delta. His plan will pave the way by providing funds for permitting, environmental review and other non-construction related hurdles. The governor recognizes the need for Delta improvements, including conveyance, and has never shied away from the topic. He also agrees with Southern California water officials that any package must be comprehensive and balanced. This is why his proposal includes storage, conveyance, ecosystem restoration and local conservation and water management programs. It's a flexible plan that's the right fit for a state with a wide variety of water demands.

California greatness is due, in part, to the vision of previous generations who built our statewide water system. But now that system needs an extreme makeover. The governor's plan will make investments to existing and new infrastructure that can help move water to where it is needed, and do so in a way that is more efficient and that protects our environment. This focus is particularly vital in the Delta, where there is an emerging consensus that we need to find new and better ways to protect the estuary and provide reliable water deliveries.

The governor's proposal also includes funding to expand water conservation programs and other local efforts such as desalination and water recycling to help meet California's water supply and quality needs well into the future.

The San Diego region is highly dependent on imported water, including deliveries from the Colorado River and the Delta. Additional funding from this plan will support a variety of water conservation and recycling efforts in the San Diego area, including upgrading existing wastewater treatment plants, promoting desalination and investing in the many proposed improvements to existing water systems in the region.

California needs a comprehensive water plan. The argument shouldn't be over which water management tools we will need in the future. California will need all of them. The focus should be on using every water management strategy properly to assure a vital economy, a healthy environment, and a high standard of living.

Making investments to have the right infrastructure and resource management programs in place can help ensure we have a flexible, long-term solution to California's water crisis.

-- Lester Snow is director of the California Department of Water Resources.

Copley News Service
WINNER OF THE 2006 PULITZER PRIZE FOR NATIONAL REPORTING

September 17, 2006

Thirsty state could lose key supply of water

Ruling may complicate north-south transfers

By Michael Gardner

SACRAMENTO – For years, environmentalists have promoted water transfers as a cost-effective, fish-friendly alternative to new dams.

But a federal judge's decision to protect a tiny, endangered fish in the Sacramento Delta could jeopardize north-to-south water sales when transfers may be crucial.

The last drought provides a lesson on the value of water transfers. California was rescued from the 1987-92 dry spell by a then-relatively new water market. The transfers provided a combined 815,000 acre-feet – enough to meet the needs of 1.6 million households – in 1991 and 1992.

Now, Gov. Arnold Schwarzenegger and legislative leaders have agreed to call back lawmakers for a special session this fall that could produce a compromise on building reservoirs and reconfiguring the plumbing system for the delta. A plan could be placed on the Feb. 5 presidential primary ballot.

Don Perata, D-Oakland, the Senate president pro tempore and a skeptic of more above-ground water storage, said the federal judge's "alarming and threatening" ruling has forced him to rethink the state's approach to its water crisis.

"We understand storage and conveyance are sides to a coin," he said. "We're not saying 'hell no' to anything."

The Senate is expected to begin deliberations on a nearly $6 billion bond measure this week.

Last week, the Association of California Water Agencies launched a media campaign to warn residents that serious problems loom. The group hopes to raise up to $9 million for the effort.

Polls show that few people realize what California is up against, said Tim Quinn, the group's executive director. "They turn the tap. The water comes out. The world is fine," he said.

Before reaching Los Angeles and San Diego, supplies from the north must flow through the Sacramento Delta's 1,100-mile maze of waterways. Two-thirds of the state's drinking water, including nearly 40 percent of all deliveries to San Diego County, meander through the delta.

In his Aug. 31 ruling, Judge Oliver Wanger ordered state and federal water managers to significantly reduce pumping from the Sacramento Delta to protect the 3-inch delta smelt.

Wanger's decision threatens to reduce deliveries by as much as 2 million acre-feet – enough for 4 million households a year – to keep the delta smelt from being drawn into the pumps near Tracy.

California is in the throes of a dry spell that will squeeze supplies tighter unless desperately needed snow arrives along the Sierra Nevada and the Colorado River basin this winter.

Subsequently, water districts across the state have drawn up rationing proposals that could cause serious economic pain.

The drought and court-ordered safeguards for delta smelt should make it abundantly clear that the state must move quickly so full deliveries can flow south, according to Roger Patterson, who tracks delta issues for the Los Angeles-based Metropolitan Water District of Southern California.

Aggressive water-saving strategies have been launched but are not the final answer, he said.

"You can't conserve what you don't have," Patterson said. "You can't recycle water you don't use in the first place."

The court decision has frustrated water managers, who are unsure whether they will be able to count on extra water from the north to tide them over this time.

"The window of opportunity to do transfers has been severely closed," Patterson said.

Timing will be everything. The pumps can begin to ramp up in the summer once the smelt migrate past. But supplies already spoken for will have first priority as more pumping is permitted, leaving little time to move any extra.

"Getting water south of the delta is the bottleneck," said Ryan Broddrick, manager of a

coalition of north state farm water agencies. "Folks are going to have to look long and hard at it."

Barry Nelson of the Natural Resources Defense Council said it's too early for water managers to cast dire warnings. The judge's ruling is expected to be clarified in the next 45 days, and this winter could bring welcome snows that would ease the crisis, he said.

"Does this mean the end of transfers? No, of course not," Nelson said.

Nelson figures water managers can find alternatives as they have previously. "Mother Nature has always thrown curves at water users," he said.

Not all transfers must navigate the delta. For example, Metropolitan will spend nearly $15 million to buy about 100,000 acre-feet from Palo Verde Valley farmers in the Blythe area in 2008 and again in 2009.

"It's a big chunk of money," Patterson said. "But for us, it's absolutely worth it."

Under the agreement, the Palo Verde Irrigation District will keep about 28,000 acres of land idle. Water-intense crops, primarily alfalfa, most likely won't be planted.

"It's been a positive for the valley," said Bart Fisher, a grower and member of the Palo Verde board. "That payment is money that goes right into the bank."

Fisher said it is unlikely there will be repercussions for farm laborers. There is a shortage of workers already, and labor-intensive produce will be planted because those harvests bring the best profits, he said.

Metropolitan struck the 35-year deal with Palo Verde growers a few years ago, agreeing to pay farmers $3,170 per acre just to sign up. That payment is on top of the $650 for every acre of land that farmers later leave unplanted at Metropolitan's request.

"It's probably the cheapest source of new water Metropolitan could find at the time," Fisher said of the arrangement.

Metropolitan has little choice. Despite healthy reserves, the wholesaler is staring at supply challenges, Patterson said.

Metropolitan has lost 600,000 acre-feet of Colorado River deliveries as part of a river-sharing agreement. The judge's decision could cost it 500,000 more acre-feet in the worst-case scenario.

Meanwhile, the population of Metropolitan's service area will grow by 220,000 people a year.

Despite looming obstacles, Metropolitan still plans to shop for water in the north. The pumping restrictions could ease, the weather could turn favorable and newly purchased water may be stored north of the delta for later delivery.

Steve Dana, who represents dozens of agricultural districts as chairman of the Northern California Water Association, said the court decision will complicate negotiations with urban suppliers.

"We're always interested in talking and trying. Whether or not there will be the possibility to do that is the question," Dana said. "The game has definitely changed." #

appealdemocrat.com

September 13, 2007

Editorial: Court order will dry up water supply; Southern California's woes no cause to party up north

When one hears about food shortages, droughts and other disasters in Third World countries, a closer look almost always reveals that such problems are man-made, usually the result of asinine government land-use or economic policies.

Even in wealthy California, government-imposed restrictions can create shortages of necessary natural resources.

While natural cycles – a heat wave and long drought – are also sipping away at the state's water supplies, a massive new shortage of water resources could result from a strange decision by a federal judge in a lawsuit brought by environmental activists.

As the Environment News Service reported, "U.S. District Judge Oliver Wanger on Aug. 31 ordered the State Water Project and federal Central Valley Project to reduce pumping in the (Sacramento River) Delta to protect the small silvery Delta smelt that has been declining year by year."

The little fish has trouble swimming fast enough to escape the pull of the pumps. Unfortunately, the fish's problem will soon become Southern California's problem – water officials will have until December to replace water sources. The reduced pumping will go on for six months at least, so this is no short-term problem.

"We're already pinched on Colorado River water," said Brett Barbre, a Municipal Water District of Orange County board member. "This will be a court-induced regulatory drought. So many environmental groups are trying to stop all progress."

California has 36 million residents, and that number is expected to rise to 60 million by midcentury. The state already imposes Draconian restrictions on land use, which makes it quite difficult to build the houses and infrastructure needed to deal with the coming residents. Curtailing water supply will further make it difficult to meet the state's growth needs.

Northern Californians, who long have chafed at Southern California's thirst for "their" water, should not celebrate the South's problems as just desserts. If water transfers through the Delta are held hostage to court orders, that only adds momentum to renewed calls for a Peripheral Canal-styled ditch that bypasses the Delta entirely. The immense

cost of such a project, and the litigation that would surely result, would drain water purveyors on both sides of the Delta.

The Schwarzenegger administration is pushing for a $5.9 billion plan to assure continued supplies from the Delta, according to published reports, and is warning about a coming crisis. So no matter what, the likely result will be forced conservation, more bond debt and higher prices for water consumers. Once again, government will have been the main obstacle to progress. #

THE CHRISTIAN SCIENCE MONITOR

September 12, 2007

WATER CRISIS SQUEEZES CALIFORNIA'S ECONOMY; A recent federal ruling to reduce the amount of water that flows through the delta is likely to boost food prices and trim jobs in agriculture

By Daniel B. Wood, staff writer

LOS ANGELES - California farmers, who produce half the nation's fruits and vegetables, say they will idle fields and cut back on planting lettuce, cotton, rice, and more.

Silicon Valley computer-chip makers and other industrial/commercial users say they will rethink manufacturing processes that use water, or dramatically raise the price of products they sell.

Cities from Sacramento to San Diego say drought-era practices of rationed water – low-use toilets and washers, designated water days for lawns and cars – are back, including stiff fines for those who don't follow the rules.

After 35 years of hemming and hawing over how to fix the largest estuary in the Western Hemisphere – the sprawl of canals, levees, and flood plains that join the Golden State's two river systems – the state has been told by a federal judge that business-as-usual is now illegal.

A new ruling to stop pumping up to 37 percent of the water that flows through the delta to protect endangered fish species has sent shock waves of concern into the three main sectors that have long competed for it: cities, farms, environment.

The estuary provides water to 23 million Californians and about 5 million acres of farmland. Overused and under maintained for years, the delta and its water are at the heart of the state's economic vitality, its wildlife habitat, shipping, transportation, drinking water, and recreation.

"In the water business we are facing the biggest challenges here in over half a century ... there is no way any knowledgeable person could contest that," says Tim Quinn, executive director of the Association of California Water Agencies, which represents more than 450 of the state's water agencies that provide water to 95 percent of the state's farms and cities. "The state has had some success in better managing this problem for the last decade, but we have hid ourselves from the biggest issue ... and Mother Nature is telling us there is no more hiding."

The biggest issue, say Mr. Quinn and others, is the clash between the environment, the California economy, and the population, which is pouring in at more than 600,000 per year.

In recent years, the use of water in the delta has been crippled as a result of drought as well as age, with deteriorating levees that are vulnerable to flood, earthquake, and subsidence. It was environmental groups who most recently challenged water use. The ruling by US District Court Judge Oliver Wanger in Fresno Aug. 31 came after a suit against state and federal water officials by the Natural Resources Defense Council (NRDC) and three other environmental groups.

The agricultural community in the Central Valley appears to be the most worried about the consequences of the judge's action.
Stephen Patricio, chairman of the board of directors for the Western Growers Association and a 30-year farmer of 2,000 acres of cantaloupe near Firebaugh, Calif., says the impact of a 30 percent or more reduction of water to his region will have a domino effect on other jobs.

He expects his $6 million payroll, employing about 600 people during the harvest, will drop to about $1.5 million this year and force him to cut 400 jobs. Those losses will contribute to another 2,400 layoffs in related industries: truck drivers, tractor operators, seed operations, warehousing, repair, and fuel, he says.

The announcement is already having an effect on the loans farmers receive to operate their farms during 2008.

"Ninety percent of these farms need to be financed, and lenders have made it very clear that without a water plan, there is no money for 2008 crops," Mr. Patricio says.

Eighty percent of the water in California moves from above the delta to farms and communities in the south of it via pumps. The environmental groups said that current use of water pumping through the delta endangered several species of fish, including two kinds of smelt (long fin and delta), steel head, green sturgeon, winter and spring salmon, and split tail.

"This ruling was essentially an agreement that we need to protect habitat in the delta more than we have been, and what state and federal agencies have been doing is likely to drive the smelt to extinction," says Barry Nelson of the NRDC. "For all the serious concern about how the state is now going to meet its water needs, no one is saying that the court got it wrong. Everyone has known for a long time that this was coming."

Water agencies, farmers, and scientists agree, saying the ruling will force a much-needed opportunity to fine-tune the use of water to avoid waste.

"This alarm as been sounding about the delta for 30 years, and we've been pushing the snooze alarm," says Peter Gleick, president of the Pacific Institute, a nonprofit think tank

in Oakland, Calif. "This may lead to some of the first discussions ever on how we manage growth in the state, how people live, how much we waste, and what crops we farm."

He notes that farming just three common crops – rice, cotton, and alfalfa – as well as irrigated pastures for cows use about half of the agricultural sector's allotment but earn a fraction of agricultural income. "We can continue to have a healthy economy with less water, but there has been no demand to do that yet," he says. "This ruling may drive us to do things we ought to be doing anyway."

Anticipating the reduced water spigot from the delta as of January 2008, water agencies north of it are telling their clients to cut back on water use. They are already spending money in new ad campaigns to remind users to cut back or face the possibility of mandatory laws with fines.

"We are spending millions to get the conservation message out that we need to conserve as if we are in a crunch," says Jeff Kightlinger, of the Metropolitan Water District of Southern California, which serves agencies and 18 million residents in six counties. He says the new rationing will affect 2 of every 3 Californians.

"Farmers across the state know this will be very tough and not pleasant," says Dave Kranz, spokesman for the California Farm Bureau Federation. "To the extent that you take farmland out of production for whatever reason, it increases another problem, which is providing enough American-grown food to serve the US population as well as demand from other countries."

Solutions are now in the works. A commission appointed by Gov. Arnold Schwarzenegger is planning to make recommendations next month, including ideas for dams and more storage capacity.

State Senate President pro tem Don Perata (D) is pushing two measures. One provides $200 million for immediate safeguards of freshwater flows from north to south. The second is a $5 billion bond that includes $2 billion to fix the water supply, improve flood protection, and boost fisheries in the delta, and $2 billion for water storage projects such as dams. #

The San Diego Union-Tribune.

September 12, 2007

District would buy desalinated water

RANCHO SANTA FE: The Santa Fe Irrigation District has agreed to buy 2,000 acre-feet of water from an ocean-water desalination plant proposed in Carlsbad.

The Rancho Santa Fe-based district would purchase 2,000 acre-feet of purified water from the plant, which privately held Poseidon Resources proposes to build on the grounds of the Encina Power Station in Carlsbad.

That amount would make up 14 percent of the district's annual need of 13,500 acre-feet. The agreement states the district will pay no more for the desalinated water than it pays the San Diego County Water Authority for its water.

Santa Fe Irrigation is the seventh district in the county to agree to buy water from the plant, which still needs a permit from the California Coastal Commission before it can be built. With the addition of Santa Fe, Poseidon has contracts to sell 93 percent of the plant's production capacity. –M.B. #

The San Diego Union-Tribune.

September 8, 2007

Vallecitos district signs on for desalinated ocean water

SAN MARCOS – The Vallecitos Water District has become the sixth agency in the county to sign up to buy desalinated ocean water from a plant proposed by a private developer.

The Vallecitos district board has agreed to buy 7,500 acre-feet of desalinated seawater annually from the plant, which Poseidon Resources proposes to build on the grounds of the Encina Power Station in Carlsbad.

The purchase would fill 37.5 percent of the annual need of the district, which serves San Marcos and parts of Carlsbad, Escondido and Vista. It also means Poseidon has sold 90 percent of the proposed plant's output.

Poseidon's application for a state coastal permit for the plant is likely to go to the Coastal Commission in November. #

KABC ABC Channel 7 - Los Angeles

September 6, 2007

Expert: Calif. 'Perfect Drought' Could Span 100 Years; In 2007, Parts of Southland Got Less Rain than Death Valley

By Dallas Raines

Sept. 6, 2007 (KABC-TV) - Southern California is now in its eighth year of an extended drought. But what would happen if that drought lasted for decades, or even a century? Some experts say the pieces are falling into place for a so-called "perfect drought," and it could have devastating consequences for California.

Higher temperatures, less water, and more wildfires -- the effects of global climate change can already be seen here in Southern California. And when you combine climate change with drought conditions, the consequences can be severe. Some say we're in the middle of a historic drought.

2007 will go down on the books as Southern California's driest year in recorded history. Fires raged out of control. Millions of dollars were lost as California crops shrivel in the searing sun. And the Eastern Sierras, where L.A. gets most of its water, marked its second lowest snowpack on record.

It's a recipe for disaster, or as one expert calls it -- the perfect drought.

"The idea of a perfect drought plays off the idea of a perfect storm," said Glen MacDonald with the Department of Geography at UCLA. "It's a convergence of natural or man-made effects that lead to a somewhat unexpected, but catastrophic result."

A so-called perfect drought would last not one or two years, but a decade or more. Scientists studying ancient tree rings have found evidence of epic droughts in Southern California, with some lasting as long as 100 years.

"You can't say with 100-percent probability, but we are putting into place the pieces for a perfect drought," said MacDonald.

This year, parts of Southern California got less rainfall than Death Valley.

"We didn't plant this time for the first time in 85 years," said Betty Bouris of Bouris Ranches.

The Bouris family has been farming in Riverside County since 1922. This year, the lack of rain forced them to lay off long-time employees and auction off their farming equipment.

"I think it hit home to me when I walked into the parts room that was absolutely stocked, and I went in there and all the shelves are empty because all the parts were sold," said Bouris.

It's a growing crisis across the American Southwest as a whole. The region is now in its eighth year of an extended drought.
Lake Mead, the nation's largest man-made reservoir, stands at less than half its normal levels. California's predicted population explosion will further strain already scarce water resources.

"California could have 50 million people by 30- or 40-years from now," said Dan Cayan, a climate researcher for the Scripps Institute and the USGS.

Water conservation in L.A. -- now voluntary -- could turn into mandatory water rationing in the not too distant future.

"If this continues for another year or two like this, we'll have a full-fledged drought and we'll need to take more drastic steps," said David Nahai, president of Department Water and Power (DWP).

Drastic steps, such as a return of the drought busters who roamed the streets of L.A. issuing citations during our last major drought from '87 to '92.

Drought conditions promote wildfires, like the one in Lake Tahoe that destroyed more than 200 homes; or the Zaca fire in Ventura County, which is now the second largest in California history.

The San Bernardino forest is tinder dry -- a million dead trees killed by bark beetles and the drought. Thousand Oaks hillsides are still scorched from a fire in January.

"If you look around you, the Chapparal, the coastal sage, it's absolutely tinder dry," said MacDonald. "It takes nothing to ignite this."

The deepening drought led Governor Schwarzenegger to declare a state of emergency in Riverside County. Extreme measures for an extreme dry spell -- but still too late for the Bouris family.

"It's just in your blood to farm," said Bouris. "It's kind of sad, to see a family tradition end like that."

Government forecasters with the National Oceanic and Atmospheric Administration have announced they believe another La Nina is on the way. That weather phenomenon is a periodic cooling of surface temperatures in the Pacific that's expected to bring drier-than-normal conditions this fall to an already drought-stricken Southern California. #

Associated Press

September 6, 2007

Contingency plans drawn up for possible SoCal water rationing

LOS ANGELES—Contingency plans currently being drawn up could force Southern California water officials to order rationing next year.

The Metropolitan Water District of Southern California, serving 18 million people in six counties, warned Wednesday that mandatory rationing could become necessary for the first time since 1991.

The district imports about two-thirds of its water from Northern California and the Colorado River.

Last week, U.S. District Judge Oliver Wanger in Fresno ruled water imports from the north must be cut up to 30 percent to protect the delta smelt, a small fish threatened with extinction.

Adding to the problem are the threat of earthquakes and flooding, saltwater intrusion and aging levees in the Sacramento-San Joaquin River Delta.

"We have further evidence that the delta is in crisis, if there was any doubt about it," said Lester Snow, director of the state Department of Water Resources.

The Metropolitan Water District stands to lose more than 10 percent of all the water members use because of the court decision.

Although it's unclear how much water will move south, the district is preparing an allocation plan on how much it might be able to provide the 26 cities and water agencies it serves, assistant general manager Roger Patterson said.

Each member agency will determine how much residents will have to cut back.

"The question is 'how soon do we need to go into that kind of decision-making?'

Do we have to do that in 2008, or do we rely on our reserve account—or (banked water) savings—to not do that in 2008? Those are the policy decisions that will be made," Patterson said.

It's hoped a rainy winter and voluntary conservation efforts will thwart rationing, he said.

Los Angeles gets nearly 70 percent of its water from the district.

"If we have rationing in Los Angeles, it won't be the first time that that has happened," said David Nahai, president of Department of Water and Power commissioners. "If that is what will be needed in order to safeguard our water supplies, well, so be it. But we'll have to see just what this plan is that Metropolitan Water District will be putting forward."

The district plans to present its allocation plan to the DWP board this fall. #

THE CALIFORNIAN
NC TIMES NET
AN EDITION OF NORTH COUNTY TIMES
NORTH COUNTY TIMES

September 5, 2007

Southern California works on emergency plan

By: GIG CONAUGHTON - Staff Writer

Days after a judge issued a ruling that could create Southern California's worst water shortages since the last great drought in 1991, the region's main water supplier said it was racing to create an emergency plan to divvy up water if rationing is necessary in 2008.

Officials from the Los Angeles-based Metropolitan Water District said Tuesday that they hope to complete an emergency plan by November.

Metropolitan Assistant Manager Roger Patterson said the agency hadn't created such a plan up to now because it has always had enough water to comfortably sustain nearly 18 million Southern Californians in six counties -- including San Diego and Riverside.

That could change in 2008.

Late Friday, U.S. District Court Judge Oliver Wanger issued an unprecedented ruling that would curtail pumping water from Northern California to the rest of the state through the fragile Sacramento-San Joaquin bay delta to protect an endangered fish, the delta smelt.

Metropolitan officials said Friday that they were still deciphering Wanger's ruling. But state officials and Metropolitan said Southern California could lose between 14 percent and 30 percent of the Northern California water that made up two-thirds of the region's supply this year.

"This is the first time since 1991 where we're saying we better have an allocation plan in place," Patterson said of the plan that would dole out potential water cuts to cities and counties. "So in the event we need to use it, it's there and ready."

Wanger issued a verbal ruling Friday and is not expected to file a written order until late October. That timetable has made it difficult for state, federal and regional water agencies to calculate the exact reductions the pumping cutbacks could cause.

Metropolitan officials said it was too soon to predict whether the agency would issue mandatory water cuts that could trickle down to the public next year.

Once Metropolitan completes an emergency plan to divide its water, the agency's board -- composed of representatives from all the agencies that buy Metropolitan's water -- will have to wait to see how the state cuts supplies from Northern California. Then the board will decide whether to issue mandatory rationing, Patterson said.

Patterson said Metropolitan sells about 2.25 million acre-feet of water each year to agencies in six counties that deliver to nearly 18 million residents. He said Metropolitan has roughly the same amount stored away in reservoirs and groundwater banks, meaning the agency could comfortably use its storage to make up the difference in lost Northern California water in 2008.

However, water officials said they worry that the court ruling could create years of cutbacks of the region's Northern California supply, and that it might be smarter to issue some mandatory cuts to the region's supply in 2008. That would leave stored water to ease shortages in 2009 and beyond.

Meanwhile, water officials from Southwest Riverside and San Diego counties Tuesday continued to react to the court's ruling with emotions ranging from anger to worry.

All of them said the state's water supply situation was the shakiest they could remember and urged people statewide to start figuring out ways to cut water use.

"We're very concerned about the ruling, and it's still unclear exactly what the impact is," said Brian Brady, general manager of Southwest Riverside's Rancho California Water District.

Other Riverside officials said their boards could start weighing the idea of using punitive rate fines to enforce potential cuts.

In the past, Southern California's water-supply woes could be reversed with a little help from Mother Nature in the form of rain and snow.

For example, in 1991, Southern California residents were facing major water cuts because of a brutal drought that ran from 1987 through 1991. However, just as San Diego County Water Authority board members were about to administer 50 percent cuts, the skies began to pour down rain in what is remembered as the "March Miracle."

But officials say rain and better snowpacks may not help much now. Rain would recharge local reservoirs and groundwater supplies. But the court order to curtail pumping in the bay delta would remain in effect to protect the delta smelt. That would mean state water officials would not have enough time to ship Southern California all of its water.

Gary Arant, longtime Valley Center Municipal Water District general manager and a Water Authority board member, said the looming shortages could have been avoided.

Arant said water leaders statewide have known for decades that California needed to

build more storage, and a "peripheral canal" that could move Northern California water around the bay delta, but legislators and voters had ignored the need.

California voters roundly defeated a peripheral canal plan in the 1980s.

"This is poised to have devastating impact on the state's economy," Arant said. "And it didn't have to happen. Like the power crisis, it didn't have to be this way." #

-- Contact staff writer Gig Conaughton at (760) 739-6696 or gconaughton@nctimes.com.

SANDIEGOSOURCE
The Daily Transcript

September 4, 2007

Water cutbacks may be a drain on local farmers

By DIANA SAMUELS, The Daily Transcript

Stephenie Caughlin started her small organic farm in the midst of drought conditions in 1988. Packing basil plants and heads of lettuce into a tiny plot of land, she designed Seabreeze Organic Farm to conserve every drop of water she could.

Water has never been cheap for San Diego farmers, and they say they've adapted and use water as effectively as they can.

But now, facing severe cutbacks, Caughlin and other local farmers say the only options left are to produce less or get out of farming altogether.

"The cutbacks that they're talking about will absolutely put me out of business," Caughlin said.

San Diego is in the midst of the driest two-year period in recorded history, according to the San Diego County Water Authority. Reservoirs on the Colorado River, one of San Diego's main outside sources of water, are at 50 percent capacity.

And in what Eric Larson, San Diego County Farm Bureau executive director, called the "third part of this triple whammy," a federal judge ruled Friday to reduce pumping at Southern California's other major water source, the Sacramento-San Joaquin River Delta. The ruling, to protect the endangered Delta smelt fish, could reduce water supply from the Delta by up to one-third.

Because of these severe supply conditions, the Southern California Metropolitan Water District is expected to cut water to many agricultural consumers by 30 percent beginning in January.

Most local farmers participate in a water district program under which they buy discounted water in exchange for agreeing to take a 30 percent cut in the case of severe conditions, before cutbacks spread to residential and other consumers.

If cutbacks were to expand to all water customers, agricultural consumers would face those extra cuts on top of the 30 percent.

Though no cutbacks are official, the water district told has told the agricultural community to prepare for the loss of water, Larson said. "Everybody's expecting a cut to come down on January 1," Larson said.

Caughlin said a cutback would be a "death blow" to her farm. Seabreeze Organic Farm is east of Torrey Pines State Reserve and grows a variety of plants under a Community-Supported Agriculture model, where customers subscribe to the farm and receive regular products in an effort to support local farming.

Too much development, too much water for residential landscaping and not enough efforts to get reclaimed water to farms are some causes of the problem, Caughlin said.

While farming costs -- such as water and property, are determined locally -- prices for her products are determined globally, Caughlin said.

Small farms like hers barely break even in good years, she said, and if her water supply is cut back, her customers are simply not going to be willing to pay even more.
"I say melt the smelt," Caughlin said. "And I'm an environmentalist, trust me!"

She said people who visit her farm are amazed at how much produce she gets from a farm of her size, measures necessary because of the high price of water.
"There's no formula for cutting back anymore," Caughlin said. "We're not stupid, we're state-of-the-art growers. And after a while, we can only take so much."

Water is more expensive in San Diego than in any other part of California, Larson said, and that, combined with high property prices, means that farmers only grow high-value crops.

About 60 percent of San Diego's agriculture is in nursery farming such as cut flowers, and 10 percent is in avocados. Agriculture is the fifth-largest industry in San Diego and contributes $1.4 billion to the local economy every year.

Water is currently a topic of "constant discussion" in the agricultural community, Larson said.

"It is the big issue at the moment, because everybody's starting to make their plans for January when the cuts hit," he said.

George McManigle, who grows avocados, oranges and other fruits at McManigle Grove in Fallbrook and also serves on the Rainbow Municipal Water District's board of directors, said he'd recently shut water off on 40 unprofitable lemon trees.

He was still waiting to hear more specifics from the Metropolitan Water District before making further decisions, but said he would have to either cut back how much water his trees get, reducing the fruit they produce, or would have to get rid of trees altogether.

Water is his biggest expense, he said, and is about 55 or 60 percent of his operating budget. It costs about $1,000 per month to water about 750 trees, including 400 avocado trees, he said.

Other crops, such as flowers, don't need quite as much water. Water makes up about 3 percent of the operating budget at Dramm & Echter Inc., a flower grower in Encinitas also known asFox Point Farms, said owner Bob Echter.

Initial water cutbacks won't affect his nursery, because he did not participate in the program for discounted water. Since water was a small part of his budget, it was more important to have a secure, uninterrupted supply, he said.

The Dramm & Echter greenhouses use a hydroponic system to grow roses and gerbera flowers.

The water drained through the system is filtered and reused, Echter said.

"We've got the system down pretty tight, so we're not really wasting water," he said. None of the farmers are wasting water, Larson said, because it has always been so expensive.

With nowhere else to make cuts, many farmers who are "borderline" in the agricultural community may sell their farms to developers, McManigle said.

"A lot of people are looking at a livelihood that's going to go away," he said. "The growers could probably make it for one year, but they definitely can't make it for two or three years."

McManigle said he hoped hurricane season could bring some El Niño-like conditions, but Larson said rain might not be enough.

"It's got to be weather like we've never seen before," Larson said. #

The San Diego Union-Tribune.

September 2, 2007

Add water . . .

More dams needed to address a looming crisis

The current drought in California, coupled with continued population growth and long-term climate change, will make it increasingly difficult to maintain a reliable water supply for San Diego. It is especially unfortunate, then, that Democratic leaders in the Legislature are spurning Gov. Arnold Schwarzenegger's efforts to bolster California's water infrastructure. San Diego, which is at the bottom of the state's pipeline, stands to suffer the most if water supplies are interrupted by drought, earthquake or other factors.

As matters stand already, San Diego farmers have been told to expect a 30 percent reduction in their state water allotment, starting next January. If dry conditions continue, as expected, the region could face a 35 percent reduction in its total water supply. This would mean more than brown lawns. Significant job losses could be expected, not only in agriculture but also in a host of other industries that rely heavily on imported water.

Schwarzenegger has proposed a $5.9 billion bond package to build two major new reservoirs and study the feasibility of constructing a canal to carry more water from the Sacramento River around the Bay Delta. In addition, money would be spent to strengthen the sprawling system of levees that protect fresh water in the delta from saltwater intrusion. The delta, which faces a variety of environmental problems, provides water for 25 million people in Southern California and the San Francisco Bay area. Preserving the delta as a viable ecosystem and a reliable source of transportable water is essential to California's future.

Predictably, the environmental lobby and key Democratic lawmakers object to building more dams. But additional storage capacity will be needed in future years as global warming reduces the Sierra Nevada snowpack, which today acts as a natural storage tank. The spring thaw in the Sierra already occurs about a week earlier than it did half a century ago. Half a century from now, with warmer temperatures likely accelerating, much of the annual snowpack will be lost if California does not build

additional reservoirs to capture it. Meanwhile, the state's population is expected to soar from 37 million today to 60 million by 2050.

Under these conditions, steps must be taken now to avert catastrophic water shortages in the future.

Although substantial storage capacity has been added in San Diego County since the last drought 20 years ago, there have been no reservoirs added to the state or federal distribution system in California for the last 28 years. The governor's call for two additional reservoirs is stymied in the Legislature and appears likely to die in the current session.

Improved conservation measures, recycled water and desalination are all promising ways to improve San Diego's water future. But, taken together, these alternatives fall far short of what is required to provide a reliable long-term supply for the state's growing population. The longer the Legislature fails to confront this reality, the worse the looming crisis will be. #

City of Carlsbad
Office of the City Council

September 14, 2007

Commissioner Patrick Kruer, Chairman
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Coastal Commission staff has received a copy of the enclosed communication

RE: Carlsbad Desalination Project

Dear Chairman Kruer,

On behalf of the City of Carlsbad, I am extending an invitation to you and the members of the Coastal Commission to join me in a tour of the site of the proposed Carlsbad Desalination Project and the award winning pilot plant. The tour would be scheduled to coincide with the Commission's November meeting in San Diego County during which the Commission is scheduled to hold a public hearing on the Desalination Project's Coastal Development Permit Application.

As you know, the City of Carlsbad has been working with Poseidon Resources since 1998 on a public-private partnership that will provide the region with a new, drought-proof supply of drinking water. Since 2003, Poseidon Resources has operated a demonstration plant on the site of the proposed full-scale facility. The pilot plant currently produces about 40,000 gallons per day of high-quality water. The purpose of the test facility is to demonstrate the viability of siting a 50 million gallon per day desalination facility at this location, optimize the desalination process design based on the characteristics of the seawater diverted from Agua Hedionda Lagoon, and acquire data for the environmental review and permitting of the full-scale project.

Over the years the pilot plant has proven to be a valuable tool in educating decision-makers about the seawater desalination process and the relationship between the plant and the environment. Poseidon Resources has provided regular tours of the demonstration facility for our public agency partners, federal, state and local officials, representatives of the media, and interested members of the public. I believe that this educational tour, which could be noticed as part of the hearing process and open to the public, would greatly enhance the Commissioners' understanding of the desalination project.

I hope you accept my invitation for this important and informative tour. I will call you in the coming week to ensure you received this letter and to discuss appropriate timing and accommodations.

Sincerely,

Mayor Claude A. "Bud" Lewis
City of Carlsbad

cc. Tom Luster

1200 Carlsbad Village Drive • Carlsbad, CA 92008-1989 • (760) 434-2830 • FAX (760) 720-9461

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

RECEIVED
JUL 31 2007
CALIFORNIA
COASTAL COMMISSION

July 19, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Attention: Chairman Pat Kruer

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Commissioners:

We are collectively writing to urge your approval of the Carlsbad Desalination Project's Coastal Development Permit.

San Diego County, and its 3 million residents, lack a reliable, drought-proof water supply. While the San Diego County Water Authority (SDCWA) has made great strides in promoting water conservation and recycling programs, we still currently import 85% of our water from the Colorado River and Sacramento-San Joaquin Bay Delta, through the Metropolitan Water District.

The SDCWA recently adopted an Urban Water Management Plan that identifies desalination as a critical component of its plan to diversify local supplies and reduce the burden on imported sources. The Carlsbad facility is integrally linked to state and regional efforts to supplement existing water supplies and is a critical component of San Diego County's future health and economic prosperity.

The Project has undergone eight years of planning and research to ensure that it is an environmentally responsible solution to the region's water needs. The City of Carlsbad certified the environmental document in 2006, concluding that there are no significant impacts for both the construction and on-going operation of the plant related to thirteen different areas studied, including marine impacts.

All of the water produced by the facility will be appropriated for public use through long-term water purchase agreements with public agencies. These water purchase agreements provide important ratepayer protections by guaranteeing the quantity, quality, reliability, and price of the water.

Currently, four SDCWA member agencies – Carlsbad Municipal Water District, Valley Center Municipal Water District, Rincon del Diablo Municipal Water District and Sweetwater Authority - have entered into long-term water purchase agreements with the Carlsbad desalination plant. Collectively, they represent nearly 70% of the plant's 50-Million-Gallon-per-Day (MGD) capacity. The plant's developer, Poseidon Resources, anticipates the remaining capacity will be subscribed by SDCWA member agencies in the very near future.

Drought conditions and the environmental impacts of climate change coupled with looming legal constraints placed on the Colorado River mandate a strategy to diversify San Diego's water portfolio. Desalination is just one part of the solution, but it's a critical part that must be pursued. To this end, we cannot afford further delays of this critical water infrastructure project. On its first opportunity, we request that the Commission approve the Carlsbad Desalination Project's Coastal Development Permit.

Sincerely,

The Honorable Christine Kehoe
39th Senate District

The Honorable Denise Ducheny
40th Senate District

The Honorable Dennis Hollingsworth
36th Senate District

The Honorable Mark Wyland
38th Senate District

The Honorable Joel Anderson
77th Assembly District

The Honorable Martin Garrick
74th Assembly District

The Honorable Shirley Horton
78th Assembly District

The Honorable Kevin Jeffries
66th Assembly District

George A. Plescia

The Honorable George Plescia
75th Assembly District

Mary Salas

The Honorable Mary Salas
79th Assembly District

Lori Saldaña

The Honorable Lori Saldaña
76th Assembly District

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
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Commissioner April Vargas
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Commissioner Adi Liberman
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Commissioner Suja Lowenthal
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Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
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Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

JERRY SANDERS
MAYOR

RECEIVED
JUL 13 2007
CALIFORNIA
COASTAL COMMISSION

July 2, 2007

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project

Dear Chairman Kruer:

I urge your approval of the Carlsbad desalination plant. The City of San Diego is the most populous municipality in San Diego County. Public health and safety is one of the highest priorities for our 1.2 million residents, and meeting our taxpayers' needs in this regard includes securing a drought-proof and affordable supply of potable water.

The City of San Diego is the largest member of the San Diego County Water Authority. While we are not planning to receive water directly from the Carlsbad facility, the plant will add 50 million gallon per day (enough for 300,000 residents annually) in new local supply benefiting the entire region, which is one of the most water deficient in California.

San Diego is dependent on important water supplies from environmentally sensitive areas, like the Colorado River. I strongly believe that a water diversification strategy must feature conservation and reclamation efforts that are augmented by new water supplies that are locally controlled.

The Carlsbad Desalination Project is one element of a much broader regional strategy to improve the diversity and reliability of the San Diego County's water supply by reducing the dependence on imported water. The implementation of the San Diego County Water Authority's Regional Water Supply Master Plan will result in a 5% to 8% overall reduction in the average energy needed to acquire and treat water for the San Diego region – including the proposed desalination project.

The need for desalination in San Diego County is clearly apparent to public agencies and the ratepayers we represent. The benefits, both environmental and financial, associated with the Carlsbad facility are also well documented.

I appreciate your attention to this important public health and safety matter. The sooner you act the better for San Diego County and its 3 million residents

Sincerely,

The Honorable Mayor Jerry Sanders
City of San Diego

JS/jin

Cc: Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Commissioner Lorena Gonzalez
Mr. Peter Douglas
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Mr. Barry Sedlik
Director Lester Snow

Mayor Ron Morrison **City of National City**

1243 National City Blvd., National City, CA 91950 Phone: 619 336-4236 Fax: 619 336-4327 Email: RMorrison@ci.national-city.ca.us

RECEIVED
JUN 0 4 2007
CALIFORNIA
COASTAL COMMISSION

May 31, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project

Dear Commissioners:

I am writing to you on behalf of the proposed Carlsbad Desalination Plant. The desalination project will benefit our residents through our water district, Sweetwater Authority, which has a long-term contract to purchase significant quantities of desalinated water.

National City is the second oldest city in San Diego County and has over 50,000 residents. Located just ten miles north of the Mexican border, National City is right in the heart of San Diego County's South Bay region. South Bay is home to many of the county's corporations and working population, and it is crucial that we provide the necessary resources to sustain our prosperity.

For many of our business and community leaders, water is one of the most important, and scarce, resources in our region. I share this belief. The South Bay, which has long been overshadowed by San Diego's more celebrated North County cities, cannot thrive if we do not have an affordable and reliable supply of water to protect us in the face of looming droughts. While the Carlsbad desalination plant is physically on the opposite end of the San Diego County, the plant's ability to serve residents in South Bay guarantees we will have equal access to a local water supply that rightfully belongs to all the County's residents.

I'm sure you share our concern about the potential impacts from droughts and climate change on the state's water supply and delivery system. We must heed the lessons from Hurricane Katrina and ensure that all of our communities, both affluent and developing, are protected from crippling natural disasters.

I urge you to vote yes on the Carlsbad Desalination Project. A copy of the Resolution that was passed by the National City City Council is attached for your information.

Best Regards,

Mayor Ron Morrison
City of National City

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JUN 0 4 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

RECEIVED
JUN 0 5 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Ms. Jessica Jones

RESOLUTION 2007 – 88

RESOLUTION OF THE CITY COUNCIL
OF THE CITY OF NATIONAL CITY
AUTHORIZING A LETTER OF SUPPORT FROM
THE CITY OF NATIONAL CITY TO THE CALIFORNIA
COASTAL COMMISSION IN REGARD TO THE
DESALINATION PROJECT IN CARLSBAD

WHEREAS, Sweetwater Authority, the water district serving the residents of National City, has signed a long-term contract to purchase desalinated water from the Desalination Project ("Project") in Carlsbad as part of it's strategy to diversify supply and plan for the future needs of their customer base; and

WHEREAS, the Desalination Project in Carlsbad is a private project being brought forward by Poseidon Resources and supported by several water districts and the City of Carlsbad through contract relationships; and

WHEREAS, the Project is moving through the process at the California Coastal Commission, and Mayor Morrison is recommending that the City of National City approve a resolution and send a letter of support for the Project to the Coastal Commission.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of National City hereby supports the Desalination Project in Carlsbad, and authorizes the Mayor to send a letter of support for such to the California Coastal Commission.

PASSED and ADOPTED this 1st day of May, 2007.

_____
Ron Morrison, Mayor

ATTEST:

_____
Michael R. Dalla, City Clerk

APPROVED AS TO FORM:

_____
George H. Eiser, III
City Attorney

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0079
(916) 319-2079
FAX (916) 319-2179

DISTRICT OFFICE
678 THIRD AVENUE, SUITE 105
CHULA VISTA, CA 91910
(619) 409-7979
FAX (619) 409-9270

Assembly
California Legislature

MARY SALAS
ASSEMBLYMEMBER, SEVENTY-NINTH DISTRICT

COMMITTEES
CHAIR
VETERANS AFFAIRS
MEMBER
HEALTH
JOBS, ECONOMIC DEVELOPMENT, AND THE ECONOMY
WATER, PARKS AND WILDLIFE

May 31, 2007

California Coastal Commission
Commissioner Sara Wan
45 Freemont Street, Suite 2000
San Francisco, CA 94105

Dear Commissioner Wan:

I represent the 79th Assembly District for the State of California. My constituents are found throughout San Diego's South Bay community, including the cities of Imperial Beach, Chula Vista, National City, Coronado and San Diego. Unfortunately, the South Bay has not always had access to the same resources, opportunities and services as the rest of the region. As an elected official since 1996, I have worked tirelessly to improve the quality of life throughout my communities.

I am pleased to support Sweetwater Authority, which provides water to thousands of my constituents, in their bid to increase their drought tolerant supplies to 36% by 2010 and become less dependent on imported water. Last year, Sweetwater Authority contracted with Poseidon Resources to purchase 2,400 acre-feet of water annually that will be produced in the Carlsbad Desalination Plant. This water will account for approximately 10% of Sweetwater's annual needs and will supply enough water fro about 4,800 families each year.

I take a personal interest in this, not only because my constituents will benefit directly from this contract, but also because I was a proud member of the Sweetwater Authority Board of Directors when we voted to approve the water purchase agreement with Poseidon Resources last year.

Additionally, this year I have sponsored two bills, AB 1435 and 1521, which deals specifically with water quality and conservation. It is crucial that we have a safe and abundant drinking water supply. I encourage residents and local businesses to conserve water and reduce usage whenever possible. But I know that is not enough in this era of global warming, drought and environmental devastation. A new source of potable water – seawater desalination – is a tested technology that can guarantee San Diego's future water needs are met.

Having participated in the approval of the water purchase agreement, I have first hand knowledge that the water produced by the desalination facility will be of the highest

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quality, meeting or exceeding all drinking water regulatory standards under law. It is also gone through rigorous testing and public scrutiny to ensure that the plant will be environmentally friendly and efficiently operated.

I am proud to support this successful public-private partnership between Poseidon Resources with the City of Carlsbad and I urge the Coastal Commission to approve this project.

Sincerely,

Mary Salas

Mary Salas
Assembly Member, 79th District

City of Carlsbad
Office of the Mayor

April 2, 2007

California Coastal Commission Board
Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Please note that Coastal Commission staff has also received a copy of this letter.

RE: Carlsbad Desalination Project
Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer and Commission Members:

The City of Carlsbad has been working with Poseidon Resources since 1998 on a public-private partnership that will provide the City of Carlsbad its entire daily requirement for water, up to 25 MGD, while assuming all risks associated with the financing, development, construction and operation of the project. This project is a win-win for the City of Carlsbad and the entire San Diego County region, which will benefit greatly from a safe, reliable source of water at a guaranteed rate.

On June 13, 2006, the City of Carlsbad certified the Environmental Impact Report for the desalination plant. In certifying the EIR, the City concluded there are no significant, unavoidable impacts for both the construction and on-going operation of the plant related to thirteen different areas studied, including water quality. The public review period of the environmental process extended over a 396-day period - almost an entire year longer than required under California environmental law - and included extensive input from a wide range of community, environmental, scientific, business and regulatory organizations.

The EIR specifically analyzed a 'no power plant' scenario, which demonstrated that the desalination plant can be operated in an environmentally responsible manner regardless of whether or not the adjacent Encina Power Station is functioning. If the power plant is ever decommissioned, Poseidon Resources will assume responsibility for dredging the lagoon, making the operation of the desalination facility crucial to the long-term health of the lagoon's more than 300-acre ecosystem.

For Carlsbad, the desalination plant represents our future water supply. It's a facility that the County Water Authority and its member agencies are counting on as part of the effort to diversify the region's water supply.

1200 Carlsbad Village Drive • Carlsbad, CA 92008-1989 • (760) 434-2830 • FAX (760) 720-9461

California Coastal Commission Board
Chairman Pat Kruer
April 2, 2007

After eight years of planning and study, we firmly believe the Carlsbad desalination plant is an environmentally responsible solution to the region's water reliably needs. The City of Carlsbad respectfully requests that the Coastal Commission approve this project when it comes up for your review.

Thank you.

Bud Lewis

CLAUDE A. "BUD" LEWIS
Mayor

cc.
Vice Chairwoman Bonnie Neely
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Senator Jim Battin
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny

ORGANIZATIONS

October 12, 2007

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COASTAL COMMISSION

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

BOYS & GIRLS CLUBS OF CARLSBAD

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David Kulchin, President
Kenneth Ames
Katie Anderson
Dawn Blackburn
Valerie Bowman
Justin Burnette
Liz Carnes
Jerry Carter
Patrick Casinelli
Scott Chelberg
Frank Cowell
Rob D'Amaro
Tony Dausilio
Farrah Douglas
Josh Gates
Colby Geller
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Tamara Gonzalez
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John Harelson
Tanya Hutchison
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Jessica Jones
Jason Labrum
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Richard Macgum
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Greg Nelson
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Astec America, Inc.
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Brookfield Homes
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Lennar Communities
Paetec Communications
Retirement Solutions, Inc.
Sunset Coast Capital
TaylorMade-adidas Golf Co.
The Corky McMillin Co.
The Wasserman Foundation
Viking Commercial Construction
Wells Fargo Private Client Services
Westfield Plaza Camino Real
Window Scenes

RE: Carlsbad Desalination Project
This letter has been sent to all Coastal Commission members and staff.

Dear Commissioners:

This letter is in support of the Carlsbad Desalination Plant, which is on your agenda for the November 15th meeting in San Diego.

I am the Chief Professional Officer for the Boys & Girls Clubs of Carlsbad. Since it opened its doors in 1952, the Club has served over 50,000 youth and continues to provide a safe haven for 2,000 children annually. Boys & Girls Clubs provide a fun, positive and educational place for our children to go after school. Everyday we help youth build character, learn respect and responsibility, and develop the necessary skills for success in the world.

Many of our programs incorporate a sense of concern for the earth and an appreciation for nature. That is why we are so proud to recognize Carlsbad Desalination Plant as a supporter of Boys & Girls Clubs of Carlsbad. The project developers have made an effort to be caretakers for the environment and our community's youth, through their stewardship of the Agua Hedionda Lagoon.

We applaud their commitment to ensure Agua Hedionda Lagoon's water quality and restoration of wetland habitat. Our children of today and of the future will appreciate the care and dedication the project proponents have demonstrated.

I hope you appreciate how beneficial this project will be to our region. On behalf of the 2,000 children who attend the Boys & Girls Clubs of Carlsbad and their families, I urge you to approve the Carlsbad Desalination Plant.

Respectfully,

Ron Sipiora
Chief Professional Officer

BOYS & GIRLS CLUBS OF CARLSBAD 50 YEARS CHANGING LIVES

The mission of the Boys & Girls Clubs of Carlsbad is to provide activities and experiences that enrich the lives of young people, inspiring and enabling them to reach their full potential.

P.O. Box 913, Carlsbad, CA 92018 www.bgccarlsbad.org
(760) 729-0207 Phone (760) 729-2279 Fax

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
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Assemblymember Shirley Horton
Assemblymember Mary Salas
Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan

Mr. Paul Thayer

Ms. Barbara Dugal

Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

The League of Women Voters North Coast San Diego County
P. O. Box 131272 Carlsbad, California 92013 760-736-1608
www.lwvncsd.org

Mr. Patrick Kruer, Chair, & the Commissioners
45 Fremont Street
San Francisco, CA 94105-2219

Dear Chairman Kruer & Commissioners:

The North Coast San Diego County League of Women Voters urges the Coastal Commission to grant all necessary permits to Poseidon Corporation Carlsbad project. It is the League's conviction that the proposed project meets all criteria developed at every level of government with respect to public review, economic feasibility, environmental impact, and monitoring and mitigation requirements. We have reviewed both EIRs prepared for this project; and we have consistently expressed our support so long as the required monitoring and mitigation are adhered to.

The League of Women Voters is always concerned that the economic, social, and environmental costs and benefits of water projects be carefully assessed. The lengthy review and marked public interest in this project have resulted in just such a thorough evaluation.

According to the NRDC, it now costs as as much to deliver water to Southern California from the State Water Project as it will cost to process sea water by means of reverse osmosis. Despite the intensive use of energy in this process, that it now costs no more than water from the State Project suggests that the actual costs of the newer technology will continue to decline.

The League believes that water conservation should be a major goal for all Californians. In keeping with this position, we further urge that the Poseidon project be required to use treated waste water from nearby treatment facilities so long as it is determined to be safe by the appropriate regulatory agencies. In addition to conservation, diversity of water resources should also be a goal. Both make good sense.

Sincerely,

Margaret H. Dornish, Co-President

October 12, 2007

The League of Women Voters is a nonpartisan organization with membership open to all citizens of voting age.

BOARD OF DIRECTORS

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Sharp Grossmont Hospital

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Dr. Omero Suarez
Grossmont Cuyamaca Community College District

Debra Turner-Emerson
St. Madeleine Sophie's Center

Deanna Weeks
East County Economic Development Council

Stuart Wells
SDG&E / SoCal Gas

Mark Weston
Helix Water District

September 11, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer and Members of the Commission:

The East County Chamber of Commerce Board of Directors wholeheartedly endorses the Carlsbad Desalination Plant, and we urge the California Coastal Commission to approve the project at the upcoming public hearing in November.

One issue that has taken on new urgency in the past 24 months is the availability and affordability of our imported water supply. The news media has reported extensively on the current drought conditions throughout the state and Colorado River regions which have led to cutbacks in the amount of water our region will be able to import next year. We believe this is only the tip of the iceberg regarding constraints on our imported water system, and it is imperative that San Diego County create new local sources of water to lessen our dependence on the Colorado River and California Bay Delta as soon as possible.

The Chamber has studied one such proposal for adding locally-controlled, drought proof water to our region's supplies, the Carlsbad Desalination Project. This project will supply enough water for 300,000 families annually throughout our County. While most East County communities will not directly receive any of the plant's water, our entire region will benefit from these additional local supplies.

I cannot emphasize enough that the Chamber's members are very concerned about the cost and reliability of water and how it will impact their businesses. For many years the hurdle confronting seawater desalination was related to cost, which was not competitive with traditional sources of water. This is no longer the case thanks to tremendous technological advances. Furthermore, the Carlsbad facility is being built by a private sector water infrastructure specialist in partnership with the City of Carlsbad and other public water agencies. This partnership ensures that ratepayers are shielded from all the risk associated with permitting, designing, constructing, financing and operating the desalination plant. And long-term water purchase agreements with public water agencies guarantee the cost of the water will never exceed the cost of imported water.

My board believes that the Carlsbad Desalination Project is a well-researched project that will help diversify our water system and benefit all of us in San Diego.

The East County Chamber of Commerce respectfully requests your support.

Regards,

Terry Saverson
President/CEO
East County Chamber of Commerce

201 SOUTH MAGNOLIA AVENUE, EL CAJON, CALIFORNIA 92020-4520 • TEL: (619) 440-6161 • FAX: (619) 440-6164
ECCHAM@EASTCOUNTYCHAMBER.ORG • WWW.EASTCOUNTYCHAMBER.ORG

September 20, 2007

Buena Vista Audubon Society
Butte Environmental Council
California Coastal Protection Network
California Coastkeeper Alliance
California Native Plant Society, San Diego Chapter
California Sportfishing Protection Alliance
California Trout
California Water Impact Network
Center For Biological Diversity
Coast Law Enforcement Action Network
Defenders of Wildlife
Desal Response Group
Environment Now
Food and Water Watch
Friends of the Buena Vista Lagoon
Heal the Bay
Los Cerritos Wetlands Land Trust
Mendonoma Marine Life Conservancy
Orange County Coastkeeper
The Ocean Conservancy
Planning and Conservation League
Residents for Responsible Desalination
San Diego Coastkeeper
San Diego Audubon Society
San Luis Obispo Coastkeeper
Santa Monica Baykeeper
Sierra Club Coasters
Sierra Club, San Diego Chapter
South Laguna Civic Association
Southern California Watershed Alliance
Surfrider Foundation

State Lands Commission
Mr. John Garamendi and Commissioners
100 Howe Ave, Suite 100 South
Sacramento, CA 95825

State Water Resources Control Board
Ms. Tam Doduc and Board Members
1001 I Street
Sacramento, CA 95814

California Coastal Commission
Patrick Kruer and Commissioners
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

San Diego Regional Water Quality Control Board
Ms. Susan Ritschel and Board Members
9174 Sky Park Court, Suite 100
San Diego, CA 92123

RE: Economically and Environmentally Sound Alternatives to the Carlsbad Desalination Project

---

Dear Commissioners and Board Members:

On behalf of the undersigned organizations, we write to express grave concerns about the proposed Carlsbad Desalination Project (CDP). Multiple reports and environmental documents show that this desalination facility will have detrimental and far-reaching effects on California's economy, marine resources and greenhouse gas emissions.

The widespread perception that ocean desalination provides an economical and reliable water supply option to California is a fallacy. Factors such as rising energy costs, expensive infrastructure, continual maintenance, and foreseeable new environmental protections make this large-scale desalination facility, as currently designed, cost-prohibitive.

The CDP will use the Encina Power Station's seawater intake system, which kills millions of fish, larvae and eggs every day. The continued use of this system is in contravention of recent court decisions and resolutions issued by the Ocean Protection Council and State Lands Commission calling for up to 90-95 percent reductions in impingement and entrainment[1]. Proven practices for desalination "feed water intakes" currently exist that avoid this unnecessary destruction of marine life and consequently improve the restoration of healthy marine ecosystems.

The CDP proposes to produce 50 million gallons per day of desalinated water. It requires 30 megawatts of power to desalinate the seawater using reverse osmosis. More energy is required to

[1] Impingement is the destruction of marine life that is trapped against open ocean intake screens. Entrainment is the destruction of countless smaller marine organisms that slip past the screens and are destroyed in the desalination pre-filtration process.

produce water from desalination than from any other water supply option in California – an estimated 720 megawatt-hours per day. This breaks down to 4,500 kilowatt-hours per acre-foot of water produced. The electricity will potentially come from non-renewable energy sources, including coal and oil powered generators, significantly increasing greenhouse gas emissions by approximately 100,000 to 170,000 metric tons. This exorbitant energy use is in contravention of the mandate in The California Global Warming Solutions Act (AB 32) to reduce greenhouse gas emissions to 1990 levels.

Finally, and perhaps most importantly, the San Diego region can greatly benefit from alternatives to ocean desalination. Future demands for water supplies should first be met by fully utilizing water conservation, wastewater reclamation, groundwater desalination and storm water management that will capture runoff for beneficial uses. Ocean desalination should be the lowest priority for water supply choices and only employed using the most environmentally protective methods and technology.

The CDP Will Adversely Impact Marine Resources

Poseidon Resources, the project's developer, has proposed to "co-locate" the CDP with the Encina Power Station, which uses seawater to cool its generators in a process known as "once through cooling". This would allow the CDP to divert 104 million gallons per day (MGD) from the discharged cooling water to supply the desalination process. The Encina Power Station withdraws seawater from the Agua Hedionda Lagoon, one of the few remaining coastal wetlands in California. Approximately 95% of this vital estuarine habitat has already been developed, making the remaining coastal wetlands even more essential to a healthy and robust marine ecological system. In order to dilute the brine by-product from the desalination process that is discharged back into the ocean outfall, the CDP requires the Power Station to withdraw a minimum of 332 MGD from the Lagoon.

Resolutions issued by the State Lands Commission and Ocean Protection Council have urged the State Water Resources Control Board to set stringent requirements on once-through cooling, including mandating up to 90-95 percent reductions in impingement and entrainment at existing power plants. New restrictions on once-through cooling are expected in the near future – long before the life of the CDP has terminated. Moreover, the recent decision in *Riverkeeper, Inc., et al. v. United States EPA* resolved a challenge to US EPA's Phase II regulations for existing facilities under Section 316(b) of the Clean Water Act, which governs the use of "once-through cooling." Among other things, this decision rejected the use of restoration measures and site-specific cost-benefit analysis as substitutes for the "best technology available." In fact, NRG Energy, Inc., the owner of Encina Power Station, has initiated a phase-out of its intake system and begun a transition to more efficient generators that will use closed-cycle cooling, a less invasive process. When this transition is complete, the CDP will effectively become a "stand alone" facility. This foreseeable near-term transition will require a Subsequent Environmental Impact Report that identifies the marine life mortality directly attributable to the ocean desalination facility. The use of a sub-seafloor intake system is mandatory to comply with Section 13142.5 of the Porter-Cologne Water Quality Control Act. This State law, not unlike the federal Clean Water Act, requires the "best technology available" to reduce adverse impacts to marine life – but expands those same protections to every industrial use of seawater.

Studies by the Long Beach Water Department and a pilot demonstration facility already in operation by the Municipal Water District of Orange County have shown these sub-seafloor intake systems to be superior in eliminating marine life mortality and reducing pre-filtration expenses.

The CDP Is Not Economically Viable

As the Coastal Commission noted in its report entitled "Seawater Desalination and the California Coastal

Act", energy use represents between one-third and one-half of the cost of desalination. Section 30253 of the Coastal Act requires that the energy consumption of new developments be minimized. As noted above, there are numerous alternatives to ocean desalination in the San Diego region, all of which dramatically reduce energy consumption in comparison to the CDP. Furthermore, should an ocean desalination facility ever prove necessary in the area, a sub-seafloor intake system must be used. Seawater filters through sand in this system, providing significantly cleaner feed water and reducing the need for pre-filtration. Cleaner feed water also eliminates the need for frequent "back-flushing" and chemical treatment of the reverse osmosis filters. The facility is thereby able to operate at maximum efficiency and reduce energy demands created by clogged filters.

Furthermore, according to the Coastal Commission report, each one-cent difference in the price per kilowatt-hour of electricity causes about a fifty-dollar difference in the cost to produce an acre-foot of desalinated water. The CDP proposal estimated its costs based on a $0.07 per kilowatt-hour rate. There is no indication that this rate will be available to the CDP during operations. The fluctuation in energy prices, combined with the additional costs of constructing the facility, operating and maintaining it, and conducting advanced ~~treatment processes ma~~ke co-located desalination cost-prohibitive.

The CDP Will Dramatically Increase Greenhouse Gas Emissions

The California Global Warming Solutions Act (AB 32), passed in 2005, requires that the State's global warming emissions be reduced to 1990 levels by the year 2020. Achieving this goal will require significant reductions in electricity consumption and the development of renewable energy sources. Approving a new desalination facility that uses 720 megawatt-hours per day runs counter to California's stated energy policy of reducing energy consumption and associated greenhouse gas emissions. The production of electricity for the CDP is estimated to create 100,000 to 170,000 metric tons of CO2 per year. This is an unacceptable increase in greenhouse gas emissions compared to the alternatives to ocean desalination.

Alternative Water Management Plans Render Ocean Desalination Unnecessary

As stated above, the San Diego region has alternatives to ocean desalination that should be fully employed before ocean desalination is considered.

For example, a recent draft report entitled "The City of San Diego Water Reuse Study" reviewed the potential for recycled water in the area. In short, the study estimated that potential recycled water production could reach 23,760 acre-feet per year from the North City Water Reclamation Plant and an additional 13,180 acre-feet per year from the South Bay Water Reclamation Plant. This approach dramatically reduces partially treated ocean discharges and consequently improves ocean water quality. The restoration of healthy marine ecosystems and reduction of health risks to humans from contact with polluted water are benefits that will not accompany ocean desalination.

Water conservation measures are effective in reducing demand and are more cost effective than producing additional supplies. The Metropolitan Water District has provided subsidies for water conservation measures and many water districts have responded favorably, particularly in this drought year. However, a tremendous gap exists between current efforts and the potential for conserving even more water. From new irrigation and landscaping techniques to plumbing technologies such as dual-flush toilets, Californians possess multiple methods to reduce water use.

San Diego County Water Authority is beginning new efforts to educate the public on water conservation. We applaud the Water Authority for these efforts and wish to mobilize the resources of our various organizations

to assist these efforts. While much has been done to conserve water from "indoor" programs, water demand reduction from proper irrigation and landscaping practices offer unquantified benefits. In fact, a majority of the water consumed in the region is attributable to outdoor uses. This area offers the greatest opportunity for improvements in water use efficiency and savings. These efforts should be undertaken on a regular basis, not just in response to emergency drought situations. Improving irrigation systems and replacing typical turf landscaping with drought-resistant gardens can greatly reduce water demand in the region. Moreover, studies conducted by the Municipal Water District of Orange County and Irvine Ranch Water District have shown that these practices can dramatically reduce polluted urban runoff.

Brackish groundwater desalination is also an effective alternative that is being used increasingly by many water districts. Brackish water, with salinity ranging from about 5 to 20 parts per thousand, generally requires less energy to desalt than ocean water, which has salinity levels greater than 20 parts per thousand. Finally, watershed restoration and innovative flood control practices can divert and store rainwater if properly designed to recharge groundwater aquifers. Strategically designed networks of "treatment wetlands" are already showing benefits by reducing pollutant loading in our coastal waterways and ocean, providing habitat for numerous aquatic species and birds, and providing a "little piece of nature" for citizens in an otherwise stark urban setting in Orange County.

These alternatives to ocean desalination provide reliable local water management strategies and simultaneously resolve intractable and expensive problems confronting local cities to reduce water pollution and improve our environment and quality of life.

A "Hard Look" Is Needed

In conclusion, we urge the State Lands Commission, Coastal Commission, State Water Resources Control Board and San Diego Regional Water Quality Control Board to take a hard look at the proposed Carlsbad Desalination Facility. When the details are analyzed, decision makers at all levels will realize that adequate and sensible alternatives exist. All Californians recognize the need for a reliable water supply, but the proposed CDP is both inefficient and harmful to California's environment and economy.

Sincerely,

Joe Geever
California Policy Coordinator
Surfrider Foundation

Signing On Behalf Of:

Andy Mauro
Buena Vista Audubon Society

Barbara Vlamis
Executive Director
Butte Environmental Council

Susan Jordan
Director
California Coastal Protection Network

Carrie Schneider
California Native Plant Society,
San Diego Chapter

Nica Knite
Southern California Program Manager
California Trout

David Hogan
Conservation Manager
Center for Biological Diversity

Kim Delfino
California Program Director
Defenders of Wildlife

Josh Basofin
Freshwater Program Manager
Environment Now

Dan and CJ Di Mento
Friends of the Buena Vista Lagoon

Tim Anderson
Los Cerritos Wetlands Trust

Garry Brown
Executive Director
Orange County Coastkeeper

Mindy McIntyre
Water Program Manager
Planning and Conservation League

Angela Haren
Programs Manager
California Coastkeeper Alliance

Jim Crenshaw
President
California Sportfishing Protection Alliance

Lisa Coffman
Executive Director
California Water Impact Network

Marcia Hianscom
Coast Law Enforcement Action Network

Conner Everts
Co-chair
Desal Response Group

Wenonah Hauter
Executive Director
Food and Water Watch

Mark Gold, D. Env.
President
Heal the Bay

Rob Cozens
Staff Conservator
Mendonoma Marine Life Conservancy

Greg Helms
The Ocean Conservancy

Merle Moshiri
President
Residents for Responsible Desalination

Gabe Solmer
Legal Director
San Diego Coastkeeper

Jim Peugh
Conservation Committee Chair
San Diego Audubon Society

Gordon Hensley
San Luis Obispo Coastkeeper

Tom Ford
Santa Monica Baykeeper

Dave Grubb
Sierra Club Coasters

Ed Kimura
Sierra Club, San Diego Chapter

Mike Beanan
South Laguna Civic Association

Dr. Suzanne Michel
Southern California Watershed Alliance

Cc: The Honorable Lori Saldana
The Honorable Christine Kehoe
The Honorable Denise Ducheny
The Honorable Dennis Hollingsworth
The Honorable Mark Wyland
The Honorable Joel Anderson
The Honorable Martin Garrick
The Honorable Shirley Horton
The Honorable Kevin Jeffries
The Honorable George Plescia
The Honorable Mary Salas

Mr. Peter Douglas
Mr. Paul Thayer
Ms. Dorothy Rice
Mr. John Robertus
Mr. Brian Prusnek
Mr. Edmund G. Brown, Jr.

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JUN 25 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

June 22, 2007

Mr. Peter Douglas
Executive Director
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Dear Mr. Douglas:

Support for Carlsbad Seawater Desalination Project

The Metropolitan Water District of Southern California supports the development of seawater desalination as part of a diversified water portfolio adopted in Metropolitan's Integrated Water Resources Plan (IRP).

Metropolitan's service area supports over 18 million people and an $800 plus billion-dollar economy. As a steward of Southern California's water resources, Metropolitan supports the development of local resources including seawater desalination.

Our IRP calls for the development of a diverse, sustainable resource mix in order to provide supply reliability to our region. The IRP includes targets for conservation, recycling, groundwater recovery and other resources, including 150,000 acre-feet of seawater desalination by 2025. The proposed Carlsbad desalination plant would help the region meet this goal, and improve overall reliability in the San Diego region.

Metropolitan's Board authorized financial assistance to help make this important project viable. Metropolitan would provide up to $14 million annually for seawater desalination from this project for potable supply that reduces demand for imported supplies.

Metropolitan and the San Diego County Water Authority are statewide leaders in water conservation, recycling, and brackish groundwater desalination (See attached SB-60 Report). However, these stewardship accomplishments need to be complemented with other progressive actions, including seawater desalination, in order to manage future demand challenges associated with population growth, climate change impacts, uncertainties in the Bay Delta and earthquake disruptions to imported pipelines. Resources such as the proposed Carlsbad desalination plant will be crucial for securing the region's water supply reliability.

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

Thank you for considering our comments.

Yours truly,

Delen Mar

for Jeffrey Kightlinger
General Manager

WAT:tt
o:\a\s\c\2007\WAT_San Diego Desal Support Letter.doc

Enclosure

cc: Ms. Sherilyn Sarb
Deputy Director
San Diego Coast District Office
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4402

Ms. Maureen A. Stapleton
General Manager
San Diego County Water Authority
4677 Overland Avenue
San Diego, CA 92123

Mr. Peter M. MacLaggan
Poseidon Resources Corporation
501 West Broadway, Suite 840
San Diego, CA 92101

HOSPITAL ASSOCIATION
of San Diego and Imperial Counties

RECEIVED
OCT 03 2007
CALIFORNIA
COASTAL COMMISSION

5575 Ruffin Road
Suite 225
San Diego, CA 92123

(858) 614-0200
Fax: (858) 614-0201

September 28, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Poseidon Resources' Carlsbad Desalination Plant
Please note that a copy of this letter has been sent to all Commissioners and staff members.

Dear Commission Members:

I am writing on behalf of the Hospital Association of San Diego & Imperial Counties (HASD&IC) in support of the Carlsbad Desalination Project.

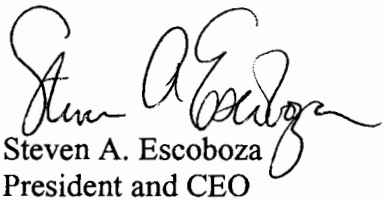
Established in 1956, HASD&IC is a non-profit organization providing leadership, representation and advocacy on behalf of over 35 hospitals and integrated health systems in the two-county region. Our member hospitals range from small, rural hospitals to large, urban medical centers and represent over 8,000 licensed beds. HASD&IC provides strong leadership, representation and advocacy with local governmental entities, business coalitions, the media, community organizations, and the public.

San Diego is experiencing a severe drought and it has been reported the region will be faced with massive cutbacks in imported water supplies in the coming year. We have grave concerns that San Diego's healthcare providers will be significantly affected if basic resources like water are unavailable or in short supply in the near future.

HASD&IC's members are located throughout San Diego County, including many areas that will directly benefit from the new desalinated water source. The Carlsbad Desalination Project will provide enough water to serve as much as 10% of the total population. The water will be affordable, reliable and drought-proof. Most importantly, it will be produced locally with an endless supply of seawater and will reduce our need to import water from drought-stricken regions.

To ensure that our members can continue to serve the population with quality patient care services, San Diego must have a reliable water supply and therefore must improve and diversify our sources for potable water. The board, staff and members of HASD&IC urge you to support the Carlsbad Desalination Project.

Thank you,



Steven A. Escoboza
President and CEO
Hospital Association of San Diego and Imperial Counties

cc: Richard Liekweg – Chair, HASD&IC Board of Directors

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Suja Lowenthal
Commissioner Lorena Gonzalez
Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President Pro Tem Don Perata

Secretary Mike Chrisman
Director Lester Snow
Senator Dennis Hollingsworth
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Martin Garrick
Assemblymember Lori Saldana
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas
Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

San Diego County Water Authority
4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

August 10, 2007

MEMBER AGENCIES

Carlsbad Municipal Water District
City of Del Mar
City of Escondido
City of National City
City of Oceanside
City of Poway
City of San Diego
Fallbrook Public Utility District
Helix Water District
Olivenhain Municipal Water District
Otay Water District
Padre Dam Municipal Water District
Camp Pendleton Marine Corps Base
Rainbow Municipal Water District
Ramona Municipal Water District
Rincon del Diablo Municipal Water District
San Dieguito Water District
Santa Fe Irrigation District
South Bay Irrigation District
Vallecitos Water District
Valley Center Municipal Water District
Vista Irrigation District
Yuima Municipal Water District

OTHER REPRESENTATIVE

County of San Diego

California Coastal Commission
Chairman Patrick Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Note: This letter has been sent to the members of the Coastal Commission and staff.

Dear Chairman Kruer:

The San Diego County Water Authority (Water Authority) Board of Directors approved a resolution (attached) in support of the Carlsbad Desalination Plant. The Water Authority supports the development of this new local water supply and strongly encourages the California Coastal Commission to approve the project's Coastal Development Permit Application No. E-06-013.

As you know, our state is facing serious water supply challenges. Dry conditions persist statewide, as evidenced by dry year conditions on the State Water Project, the eight years of continuous drought on the Colorado River and recent record low precipitation here in San Diego. These factors have aligned to constrain the available water supplies for our region. To further compound matters beyond our current hydrologic situation, the State Water Project, our state's main water supply artery that provides water to over 23 million residents, is facing pumping restrictions to protect the Delta Smelt. This could significantly reduce deliveries and further restrict water supplies to Southern California.

In light of these conditions, it is necessary for water agencies around the state to take steps to diversify their water supplies and, as part of that diversification, secure new drought-proof water supplies. The Water Authority is doing just that. On April 18, 2007, the Water Authority Board adopted an updated 2005 Urban Water Management Plan that outlines how our region will meet its water supply needs. Key elements of this plan include the region's aggressive pursuit of water conservation and recycling as well as reliance on the Carlsbad Desalination Plant as a new, drought-proof local supply. It is important to point out that collectively San Diego's local and regional water conservation programs will reduce our region's reliance on imported water by more than 100,000 acre-feet annually by 2025. We are also overseeing some of the most aggressive water recycling programs in Southern California that will result in a quadrupling in the use of recycled water by 2025. Still, we must pursue new drought-proof supplies like ocean desalination to stave off threats to public health and regional economic vitality. The California Department of Water Resources' Water Plan Update identifies the need for 500,000 acre-feet per year of desalinated water by 2030, and the Metropolitan Water

District of Southern California's Integrated Water Resources Plan identifies a need for 150,000 acre-feet per-year of seawater desalination (including 56,000 acre-feet per-year from the Carlsbad project) to ensure regional water supply reliability.

Currently, five Water Authority member agencies – Carlsbad Municipal Water District, Valley Center Municipal Water District, Rincon del Diablo Municipal Water District, Sweetwater Authority, and Rainbow Municipal Water District - have entered into long-term water purchase agreements with the Carlsbad Desalination Plant. Collectively, they represent nearly 70 percent of the plant's 50-million-gallon-per-day (MGD) capacity.

In summary, the Water Authority is counting on the Carlsbad Desalination Plant to help meet the region's water reliability goals and to help protect our ratepayers from water supply shortages. Thank you for your consideration of San Diego County's water supply needs.

Sincerely,

Fern M. Steiner, Chair
Board of Directors

Attachment 1 San Diego County Water Authority Carlsbad Desalination Plant Resolution

cc:

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Suja Lowenthal
Mr. Peter Douglas

Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
Senator Tom Harman
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Mimi Walters
Assemblymember Martin Garrick
Assemblymember Lori Saldana
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas
Assemblymember Bob Huff
Assemblymember Jim Silva
Assemblymember Van Tran
Assemblymember Chuck DeVore
Assemblymember Todd Spitzer
Assemblymember Mike Duvall
Commissioner John Garamendi

Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President Pro Tem Don Perata
Secretary Mike Chrisman
Mr. Barry Sedlik
Director Lester Snow
Senator Dennis Hollingsworth
Senator Jim Battin

Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Attachment 1

RESOLUTION NO. 2007- 13

RESOLUTION OF THE BOARD OF DIRECTORS OF THE SAN DIEGO COUNTY WATER AUTHORITY IN SUPPORT OF THE CARLSBAD DESALINATION PROJECT

WHEREAS, seawater desalination has been identified as a key component of the Water Authority's efforts to further diversify the region's water supply portfolio.

WHEREAS, the Water Authority adopted a Drought Management Plan that provides an encourages its member agencies to pursue the development of highly reliable, local drought-proof supplies; and

WHEREAS, On July 27, 2006, the Water Authority Board of Directors took action to not pursue a regional seawater desalination facility at the Encina Power Station, and reaffirmed its contractual commitment to the City of Carlsbad to facilitate the development of the privately-owned Carlsbad Desalination Project; and

WHEREAS, the successful implementation of the Carlsbad Desalination Project will enhance reliability of San Diego County's water supply by providing a drought-proof local supply.

WHEREAS, Water Authority member agencies including the Carlsbad Municipal Water District, Valley Center Municipal Water District, Rincon del Diablo Municipal Water District, and Sweetwater Authority have now entered into long-term agreements to purchase desalinated water from the Carlsbad Desalination Project; and

WHEREAS, California Water Code Sections 10610 through 10657, known as the Urban Water Management Planning Act (Act), requires urban water suppliers to prepare and adopt an Urban Water Management Plan every five years on or before December 31, in years ending in five and zero; and

WHEREAS, the Act specifies the requirements and procedures for adopting such Urban Water Management Plans; and

WHEREAS, the Water Authority Board of Directors on April 26, 2007, approved and adopted the Updated 2005 Urban Water Management Plan (UWMP), which includes 40,000 acre-feet per year of desalinated water produced from the Carlsbad Desalination Project as a verifiable local water supply that can be delivered to Water Authority member agencies; and

WHEREAS, the Updated 2005 UWMP identifies a local seawater desalination goal of 56,000 acre-feet-per-year; and

WHEREAS, the State of California, in the California Water Plan Update 2005, includes desalination as resource management strategy to meet California's future water needs, and has identified a potential water supply need of up to 500,000 acre-feet per year from brackish and seawater desalination projects; and

WHEREAS, the Metropolitan Water District of Southern California (Metropolitan) supports the development of local resources, including seawater desalination. Metropolitan's Integrated Resources Plan calls for the development of a diverse, sustainable resource mix in order to provide supply reliability to our region. The Integrated Resources Plan includes targets for conservation, recycling, groundwater recovery, and other resources, including 150,000 acre-feet of seawater desalination by 2025; and

WHEREAS, the Water Authority Board of Directors on April 26, 2007, approved and adopted the Updated 2005 Urban Water Management Plan (UWMP) which states that the Water Authority will actively work to secure the $250 per acre foot incentive funding under Metropolitan's Seawater Desalination Program for its member agencies participating in the Carlsbad Desalination Project and will actively work to facilitate the development of the Carlsbad Desalination Project, including supporting the permitting of the project through state regulatory agencies such as the California Coastal Commission and the State Lands Commission;

NOW THEREFORE, the Board of Directors of the San Diego County Water Authority resolves:

1. The foregoing recitals are true and correct and constitute the findings and determinations of the Board of Directors.

2. The Water Authority recognizes the regional and statewide importance of developing seawater desalination as a new, reliable drought-proof water supply.

3. The Carlsbad Desalination Project is essential to the Water Authority's ability to achieve the supply diversification goals contained in the 2005 UWMP

4. The Carlsbad Desalination Project can be developed in an environmentally responsible manner.

5. The Water Authority supports the development of this new local water supply and will coordinate with project stakeholders to actively support the permitting of the project through state regulatory agencies such as the California Coastal Commission and the State Lands Commission

6. This resolution is effective upon adoption.

PASSED, APPROVED AND ADOPTED this 28th day of June 2007, by the following vote:

AYES: Unless noted below, all Directors voted aye.

NOES:

ABSTAIN:

ABSENT: Morrison, Muir (p), and Quist

Fern Steiner, Chair
Board of Directors

ATTEST:

Mark Watton, Secretary
Board of Directors

I, Doria F. Lore, Clerk of the Board of the San Diego County Water Authority, certify that the vote shown above is correct and this Resolution No. 2007- 13 was duly adopted at the meeting of the Board of Directors on the date stated above.

Doria F. Lore
Clerk of the Board

Association of California Water Agencies
Leadership Advocacy Information *Since 1910*

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JUL 0 2 2007
CALIFORNIA
COASTAL COMMISSION

June 29, 2007

California Coastal Commission Board
Chairman Pat Kruer
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Please note that all Coastal Commission members and staff have received a copy of this letter.

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Coastal Commission Members and staff:

On behalf of the Association of California Water Agencies (ACWA) I am submitting the following letter to advise you of ACWA's support for the Carlsbad Desalination Project (Coastal Development Permit Application No. E-06-013). ACWA was founded in 1910 to represent, advocate for and provide services to member water agencies throughout California. It is the largest coalition of public water agencies in the country with nearly 450 public agency members which are collectively responsible for 90% of the water delivered to cities, farms and businesses in California. ACWA promotes development, management and reasonable beneficial use of good quality water at the lowest practical cost in an environmentally balanced manner.

ACWA recently released a new water policy document, ***No Time to Waste: A Blueprint for California Water***, which we believe will play a major role in shaping California's water policy for many years to come. It provides a clear vision for how California can best meet its future water needs, including 12 recommendations to ensure that California has the water supply system it will need in the future. One of these recommendations deals specifically with desalination:

Association of California Water Agencies 910 K Street, Suite 100, Sacramento, California 95814-3577 **916/441-4545** FAX 916/325-4849
Hall of the States 400 N. Capitol St., N.W., Suite 357 South, Washington, D.C. 20001-1512 **202/434-4760** FAX 202/434-4763

> "Work with local agencies to overcome constraints to developing seawater and brackish groundwater desalination. Seawater and brackish groundwater desalination projects have the potential to play a critical role in the state's water supply mix. ACWA recommends that state and federal agencies work with local agencies to develop desalination by providing support and resources for needed research, streamlining and coordinating the approval process for projects, and exploring ways to allow desalination projects to take advantage of non-retail power rates."

The Carlsbad Desalination Plant meets ACWA's aforementioned policy objective.

The Carlsbad Desalination Project is part of the supply diversification necessary for San Diego County and urban southern California to achieve water reliability. Along with aggressive water conservation & recycling efforts by the San Diego County Water Authority and its member agencies, the Carlsbad desalination project will provide 56,000 acre feet of highly reliable local supplies and reduce the San Diego region's reliance on imports from the Bay Delta and Colorado River. With those supplies drastically and adversely affected by droughts and increasing legal and environmental constraints, San Diego needs to develop more abundant and more reliable local water supplies. Desalinated seawater can fulfill those needs cost-effectively and in an environmentally responsible manner.

We respectfully urge the Commission to approve Poseidon Resources' permit application at its first opportunity.

Thank You,

Sincerely,

Steve Hall
Executive Director

SKH:dgp

cc:

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
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RECEIVED
JUN 2 7 2007
CALIFORNIA
COMMISSION
SAN DIEGO COAST DISTRICT

Sea Cliff Homeowners Association

c/o **JAMES LANG, HOA President** **(760) 438-6680**
7409 Linden Terrace
Carlsbad, CA 92011

June 18, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

Subject: Carlsbad Desalination Project

Dear Members of the Commission:

I represent the residents of 300 homes which comprise the Sea Cliff community in Carlsbad, CA. Many of us have studied the plan for the Carlsbad Desalination Plant and are impressed with the potential value it will bring to Carlsbad and surrounding communities.

We strongly support the project.

Sea Cliff is a great place to live, in part, due to our close proximity to the coast in Carlsbad and also because of our common green area, with unique and beautiful landscaping and lakes. We deeply appreciate the importance of water for residential and irrigation purposes. We also commend the fore-sight of Carlsbad leaders to ensure our water supply, and offer such benefits to our neighbors, by constructing the Carlsbad Desalinization Plant.

We also feel that the Desalination Plant will offer cost savings and be environmentally friendly. Energy savings are part of the picture since pumping and transportation of water from the Colorado River or Northern California will be reduced or eliminated. Such savings are expected to offset the energy requirements of the desalinization process. The "so called" salinity impact on the nearby ocean waters is no different than the impact as water evaporates from the ocean to enter the fresh water supply cycle.

It is extremely comforting that the City of Carlsbad is being proactive in addressing these issues in a thoughtful and farsighted way instead of waiting until the declining water supply or energy problems grow to crisis proportions. We believe the desalination plant is necessary to secure a future water supply for Carlsbad residents, such as ourselves. We are grateful that the City of Carlsbad and Poseidon Resources are working together to make this happen.

We strongly encourage you and your fellow Commissioners to approve this project as soon as possible.

Sincerely,

James D. Lang

James D. Lang
President, Sea Cliff Homeowners Association

cc. Coastal Commission staff

CalChamber
CALIFORNIA CHAMBER OF COMMERCE

RECEIVED
JUN 11 2007
CALIFORNIA
COASTAL COMMISSION

June 8, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

Dear Chairman Kruer:

For more than 100 years, the California Chamber of Commerce (CalChamber) has worked to make California a better place to do business. We have over 15,000 members, representing one-fourth of the private sector workforce in California. We serve as an advocate and resource for large and small California employers and work within state and federal politics to ensure fair legislation and a pro-business climate. Our goal is to enhance the California economy and make the state a better place to live, work and do business.

California is a dry winter or two away from a drought and subsequent water rationing for parts of the state. A major disaster in the Delta could cut off half the water supplies for 23 million people residing in the southern part of the state who are dependent on the State Water Project for a million acre-feet of water per year. The state has an obligation to pursue all reasonable means of protecting and enhancing water supplies now, before the crisis hits.

Southern California has a long history of importing water from the Colorado River and the Bay-Delta region due to insufficient local resources. To meet the needs of homes, businesses and agriculture in the region, San Diego County imports almost 90% of its water. The lack of affordable and dependable supplies of potable water has threatened a stable business climate for decades.

That's why the CalChamber recently made the decision to endorse the Carlsbad Desalination Plant being built in a public-private partnership between Poseidon Resources and the City of Carlsbad. Desalination is not a new or untested technology, but until recently it was deemed to be too expensive. Technological advances, and in the case of the Carlsbad facility private sector investment, makes this project financially feasible for the public water districts that will benefit from the plant's output.

Environmentally, the project has put more than adequate safeguards in place to address potential environmental issues including water quality, discharge and the

1215 K Street, Suite 1400
Sacramento, CA 95814
916 444 6670
www.calchamber.com

monitoring of brine levels. The impact to marine life is minimal and no endangered or at-risk species are located within nearby environs.

In addition, the project will generate an estimated $170 million in economic impact and create more than 2,100 jobs during construction, and $37 million in annual spending throughout the region once the desalination plant is operational.

The CalChamber is confident that the Carlsbad Desalination Plant will be an environmentally and economically responsible solution to meeting the San Diego region's water needs with no risk to the plant's public water agency customers and their ratepayers.

We respectfully request that the Commission approve the permit application for the project.

Sincerely,

Valerie Nera, Policy Advocate

cc:

Vice Chairwoman Bonnie Neely
Commissioner Dan Secord
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark

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VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

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Robert A. Polito
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Director
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Director
Randy D. Haskell
Director

June 6, 2007

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JUN 0 8 2007
CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

This letter has been sent to all members of the Coastal Commission and all staff members.

RE: Carlsbad Desalination Project

Dear Commissioners:

Attach for your review is an editorial from the *North County Times* published yesterday, Tuesday, June 5, 2007. I am bringing this opinion piece to your attention because it reflects the urgency in which San Diego County awaits the completion of the Carlsbad Desalination Plant.

The Valley Center Municipal Water District was formed in 1954, to secure a more reliable source of water to serve our communities. We are the largest agricultural water district in the county, serving 25,000 residents and 24,000 acres of agricultural land within the unincorporated communities of Valley Center, Jesmond Dene, Hidden Meadows, Circle R and Welks' Village. Our district, like much of San Diego, is reliant on imported water from Metropolitan Water District. It is imperative that we find cost-efficient, drought-proof ways to expand our supply of drinking water. After extensively studying desalination, our board entered a contract to purchase 7,500 acre-feet per year of water from the Carlsbad desalination plant.

The shut down of the Sacramento-San Joaquin Bay Delta pumps is just the latest event that eventually could have a catastrophic impact on Southern California. Drought conditions across Southern California coupled with environmental and legal constraints on our traditional water supplies are creating a real urgency among public water agencies to diversify our portfolios and develop local supplies.

The attached *North County Times* editorial speaks for itself. Without further delay, I urge you to move the Carlsbad Desalination Plant through the Coastal Commission's approval process. Thank you for your consideration.

Sincerely,

Gary Broomell

Gary Broomell
President

Attachment: *North County Times* editorial

29300 Valley Center Road • P.O. Box 67 • Valley Center, CA 92082
(760) 749-1600 • FAX (760) 749-6478 • TDD (760) 749-2665 • www.vcmwd.org • e-mail vcwater@vcmwd.org

cc.

Chairman Pat Kruer
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THE CALIFORNIAN
NC TIMES
AN EDITION OF NORTH COUNTY TIMES
NORTH COUNTY TIMES

June 5, 2007

Poseidon's adventure

Our view: North County's water future in Coastal Commission's hands

The history of the American West is also the history of our engineering ability to divert water from remote to more populated areas. Last week's abrupt shutdown of the pumps in Northern California's Bay Delta, one of the two main sources of San Diego County's water, has given extra impetus to North County's attempt to develop local sources of drinking water -- even if that source is the salty sea.

Since 2000, Poseidon Resources Inc. has been working with local agencies, primarily the city of Carlsbad, to build a desalination plant next to the Encina power plant. That site's main selling point is the seawater the power plant already sucks in to cool its electricity-producing turbines. Poseidon's plan is to siphon off a portion and then force the seawater through filters that remove the salt and make it potable.

That cooling process kills off some sea life, so it requires a special permit. Poseidon is hoping to piggy-back on Encina's existing permit in its quest to supply North County with 50 million gallons of fresh water a day.

Although Poseidon's plans have suffered some setbacks, notably including the county water authority's decision not to participate in the project, it has found a market. About 65 percent of the plant's projected water output has already been slurped up in purchase agreements with buyers, including the Carlsbad, Valley Center, Sweetwater and Rincon water districts.

Negotiations are under way with the Vallecitos, Olivenhain, Santa Fe and Rainbow water districts. General Electric, which would supply the plant with a high-tech membrane to filter the seawater, also recently announced plans to invest in the $300 million plant, provided it gets a permit.

The argument in favor of desalination gets stronger with each passing day. Although this time the Bay Delta pump shut-off was temporary, pending lawsuits could make such stoppages more frequent. Water officials say that this situation has added a whole new layer of complexity to an already serious water-shortage problem.

But that's not the only issue. The snowpack in the Sierra Nevadas, which melts into the Bay Delta system, reached historic lows this year. Compounding our water woes,

California has seen its share of Colorado River water decreased, and the region is experiencing a drought . Although they haven't yet declared this a formal drought, country water officials are encouraging individuals and businesses to do everything they can to conserve water.

It is against this gloomy backdrop that Poseidon submitted the fourth version of its permit application to the California Coastal Commission on Friday. The Coastal Commission is moving at its customary glacial pace, asking questions like whether it wouldn't make more sense for the desalination plant to move five miles farther from the sea, or whether a new source of water would encourage growth in coastal North County. Memo to Sacramento: We have already experienced a spot of growth; the issue now is whether we'll be able to sustain ourselves in the coastal desert.

Desalination alone won't solve the region's water problems, but it will help us tap an additional, local water source with no prospects for drying up: the Pacific Ocean. The Coastal Commission is on the clock, and we're getting thirsty waiting for its decision. #

UNITED ASSOCIATION
of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should be confined to one subject

UA Local Union:

Subject:

Plumbers & Pipefitters Local Union #230
6313 Nancy Ridge Dr., San Diego, California 92121
(858) 554-0586 fax (858) 554-0591
www.unionpipepros.org

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General President

Patrick R. Perno
General Secretary-Treasurer

Stephen F. Kelly
Assistant General President

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MAY 29 2007
CALIFORNIA COASTAL COMMISSION

May 16, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Coastal Development Permit Application No. E-06-013 (Carlsbad Desalination Plant)
NOTE: This letter has been sent to all Coastal Commission members and staff.

Dear Commission Members,

On behalf of the 1,600 members of the United Association of Plumbers & Pipefitters Local 230, I would like to offer our endorsement of the Carlsbad Desalination Project that is coming before the Commission this year.

The City of Carlsbad's public-private partnership with Poseidon Resources makes an effort to address our region's critical water needs by building and operating a desalination plant, at no risk to the city and its taxpayers. This plant will provide enough water to meet the needs of 300,000 households annually, while reducing the burden on San Diego's imported water supply. The project has been under development since 1998 and the time has come for it to move forward and finally begin construction.

As demonstrated by years of research studies and the project EIR's findings, the plant will be constructed and operated in an environmentally responsible manner. There will be minimal impact on the ocean water quality and marine life; in fact, its operation will guarantee the long-term health of the nearby Agua Hedionda Lagoon.

Additionally, the impact this plant will have on our region economically is well recognized. Not only will it create more than 2100 jobs during construction and hundreds of stable, high-paying jobs during operation, the project will generate millions of dollars in local spending and tax revenues for local governments.

Our members will benefit greatly through the Project Labor Agreement signed in 2005 with Poseidon Resources, which guarantees that local firms and union members will be building this plant.

RECEIVED
MAY 21 2007
BY:

We are confident that the Carlsbad Desalination Plant will be an environmentally and economically responsible solution to meeting the San Diego region's water needs.

On behalf of my members, we respectfully request that you approve this important project, which will bring this region one step closer to a safe, reliable and cost-effective water supply.

Sincerely,

Nico Ferraro

Nico Ferraro
Business Manager
Financial Secretary-Treasurer

cc.
Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
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Commissioner Khatchik Achadjian
Commissioner Sara Wan
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San Diego County
Taxpayers
Association

Targeting Waste • Promoting Efficiency

110 West C Street, Suite 714, San Diego, CA 92101 • P: (619) 234-6423 • F: (619) 234-7403 • www.sdcta.org

May 14, 2007

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Note: This letter has been sent to all members of the Coastal Commission and staff members.

RE: Carlsbad Desalination Project

Dear Chairman Kruer:

I am writing on behalf of the San Diego County Taxpayers Association, a non-profit, non-partisan organization, dedicated to promoting cost-effective and efficient government and opposing unnecessary new taxes and fees. For the past six decades, our organization has saved the region's taxpayers millions of dollars, and generated information to help educate the public.

SDCTA has played a crucial role in establishing San Diego's civic infrastructure ranging from the creation and development the Point Loma Sewage plant, Mission Bay Park, the Construction of Qualcomm Stadium, to the passage of the $1.5 billion school bond -- Prop MM. We are dedicated to providing a focused, honest, and principled assessment of San Diego County's local government and spending issues that will impact ratepayers throughout the region.

Given the significant utility rate increases that have impacted San Diego's ratepayers in the past few years, we support the efforts made by the City of Carlsbad and Poseidon Resources to develop new potable water supplies – at no risk to taxpayers.

In evaluating the benefits this project provides to ratepayers, it's important to recognize that the estimated cost of public and private infrastructure projects across Southern California have risen astronomically due to increases in construction costs. It is clear that without the upfront financial investment by Poseidon Resources, Carlsbad's private sector partner, this project would have failed to reach this pivotal point in the approval process.

Furthermore, the long-term water purchase agreements Poseidon has signed with several public water agencies across the County ensures the cost of water to be equal to or less than the cost of imported water. Not to be overlooked is the dedication of over 15 acres of oceanfront and lagoon front property for marine restoration and enhancement of public access and recreation opportunities. This binding commitment on Poseidon's behalf also includes the long-term

maintenance of the Agua Hedionda Lagoon should the Power Plant no longer need the lagoon as a source of cooling water. This commitment alone represents significant financial value to the taxpayers in the form of avoided costs to local government for the lagoon's upkeep.

Finally, this project will generate revenues for local governments including $2.4 million in property tax per year for the next 30 years, as well as $10.4 million in sales tax during construction, and $2.9 million per year thereafter.

Our organization extends our full support of the City of Carlsbad's environmentally sensitive, fiscally responsible project with Poseidon Resources. SDCTA is pleased to endorse the proposed Carlsbad Seawater Desalination project and respectfully requests your immediate approval.

Sincerely,

Lani Lutar
President & CEO

cc:

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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Ms. Jessica Jones

San Diego
Regional
Economic
Development
Corporation

May 11, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Please note that Coastal Commission staff has received a copy of the enclosed communication.

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

I would first like to offer my congratulations on your recent appointment as Chair of the Coastal Commission. I'm confident that your strong, independent leadership on the board will help preserve the health of California's coastline, while contributing to our economic vitality.

For the past 41 years, the San Diego Regional Economic Development Corporation (EDC) has worked to develop a diverse, technology-driven economy throughout San Diego County. We focus our resources on issues of regional competitiveness, actively pursuing the growth and expansion of high-wage, high-growth industries.

Because San Diego County is entirely dependent on imported water, our current and future economic prosperity greatly rely on having an affordable, dependable water supply. EDC shares the belief held by Governor Schwarzenegger and members of the state legislature that desalination will help meet these needs, ensuring that infrastructure will be adequate to accommodate future population growth while providing valuable economic benefits to the region.

Direct economic benefits will include an estimated $170 million in spending during construction, 2,100 jobs created during construction, and $37 million in annual spending throughout the county once the desalination plant is operational. For the entire region, the desalination facility will create jobs, generate tax revenue, improve water quality and enhance water reliability with a new drought-proof supply.

530 B Street
Seventh Floor
San Diego
CA 92101

Ph: 619-234-8484
Fax: 619-234-1935

www.sandiegobusiness.org

The San Diego Regional Economic Development Corporation would like to offer our full support of the Carlsbad Desalination Project. We urge the commission to approve this project as expeditiously as possible and move our region one step closer to an affordable, high-quality water supply.

Sincerely,

Andrew L. Poat
Vice President, Public Policy
San Diego Regional Economic Development Corporation

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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Ms. Jessica Jones

CARLSBAD
CHAMBER OF COMMERCE

RECEIVED
MAY 1 0 2007
CALIFORNIA
COASTAL COMMISSION

May 3, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

Coastal Commission members and staff have received a copy of this letter

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

Since 1923, the Carlsbad Chamber of Commerce has been working to promote a favorable business climate at the local, state and federal levels. We make certain the business perspective is heard on a variety of critical issues that affect our local economy. Currently, the Chamber represents more than 1,700 business members that employ more than 35,000 employees and maintains a continuing dialogue with elected officials at all levels.

Today, I am writing on behalf of my board and the entire Carlsbad Chamber of Commerce in support of the Carlsbad Desalination Project. I have represented the Chamber many times at permit hearings held by the City of Carlsbad and the San Diego Regional Water Quality Control Board.

Over the past few years, securing a reliable and affordable potable water supply has become one of my organization's top priorities.

The City of Carlsbad's public-private partnership with Poseidon Resources makes an effort to address our region's critical need by building and operating a desalination plant, at no risk to the city and its taxpayers. This plant will provide enough water to meet the needs of the City of Carlsbad, while reducing the burden on San Diego's water supply and creating hundreds of local jobs, during both the construction and operation of the plant.

Despite the many benefits this project brings the region, we would not support it if we felt it was harmful to the environment. The Chamber is greatly concerned about the Agua Hedionda Lagoon, which is a vital resource for Carlsbad's tourism industry and business economy. Many companies and individuals depend on the health of the lagoon and nearby beaches, including a thriving aquaculture farm, Hubbs Sea World Research Institute, and several water recreational facilities.

5934 Priestly Drive • Carlsbad, California 92008
Phone: (760) 931-8400 • Fax: (760) 931-9153 • E-mail: chamber@carlsbad.org • Web: www.carlsbad.org

ACCREDITED

After a thorough study of the project EIR, we have concluded that the project can and will be constructed and operated in an environmentally responsible manner. I have personally reviewed this plan and I feel confident that not only does it put into a place a multitude of protections for the lagoon during the plant's operation; it also ensures that the lagoon and surrounding marine environment will continue to be a clean, healthy marine environment in the long-term.

The Chamber sincerely believes that the Carlsbad desalination plant is the most important water infrastructure project in our city's history. We applaud the City of Carlsbad and Poseidon Resources for taking this important step towards finding water solutions for the region and urge your approval of the project.

Respectuflly,

Ted Owen
President and CEO

CC:

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Trent Orr
Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President Pro Tem Don Perata
Secretary Mike Chrisman
Mr. Barry Sedlik
Director Lester Snow
Senator Dennis Hollingsworth
Senator Jim Battin
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
Senator Tom Harman
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Mimi Walters
Assemblymember Martin Garrick
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Assemblymember Mary Salas
Assemblymember Bob Huff
Assemblymember Jim Silva
Assemblymember Van Tran
Assemblymember Chuck DeVore
Assemblymember Todd Spitzer
Assemblymember Mike Duvall
Commissioner John Garamendi
Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

For the region, the desalination facility will create jobs, generate tax revenue, improve water quality and enhance water reliability with a new drought-proof supply. We urge your approval of the Carlsbad Desalination Project, which will bring this region one step closer to a safe, reliable and cost-effective water supply.

Respectfully,

Tom Lemmon
San Diego County Building and Construction Trades Council

TL/ab opeiu#537 afl-cio

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
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Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

April 16, 2007

RECEIVED

APR 1 9 2007

CALIFORNIA
COASTAL COMMISSION

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Coastal Commission staff has received a copy of the enclosed communication

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

We are writing to bring your attention to the need for the Carlsbad desalination plant – one of the most important water infrastructure projects currently being planned for the state of California.

Our water agencies have entered into, or are negotiating, long-term water purchase agreements with the plant's developer, Poseidon Resources Corporation. Collectively, we have the potential to utilize 100% of the plant's 56,000 AFY capacity. While we each have unique reasons for securing water from the Carlsbad plant, we share the common goal of improving water supply reliability in the San Diego region through reduced dependence on imported water. We are moving aggressively to augment our long-standing commitment to water conservation, water recycling and brackish water demineralization with a new, locally controlled drought-proof supply of potable water.

Attached for your review are a series of recent newspaper reports that clearly state the need for California, and more specifically San Diego County, to lessen our demand on the Colorado River and the Sacramento San Joaquin Bay Delta. We hope these articles provide you with a greater appreciation for the water management challenges confronting California and our four public water agencies as we move to address the impacts of global warming and other threats to our potable water supply.

Thank you for your consideration of this critical new, environmentally-responsible water supply for San Diego County.

Sincerely,

The Honorable Claude A. "Bud" Lewis
Mayor, City of Carlsbad

Gary Broomell
President, Valley Center Municipal Water District

Dr. Hanno E.G. Ix
President, Rincon del Diablo Municipal Water District

R. Mitchel Beauchamp
Board Chairman, Sweetwater Authority

Susan J. Varty
President, Olivenhain Municipal Water District

Rua M. Petty
President, Rainbow Municipal Water District

Mr. William W. Rucker
General Manager, Vallecitos Water District

Mr. Robert "Bud" Irvin
President, Santa Fe Irrigation District

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
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Commissioner Khatchik Achadjian
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Ms. Judy Brown
Ms. Jessica Jones

Los Angeles Times
latimes.com

April 6, 2007

Permanent drought predicted for Southwest; Study says global warming threatens to create a Dust Bowl-like period. Water politics could also get heated

By Alan Zarembo and Bettina Boxall, staff writers

The driest periods of the last century — the Dust Bowl of the 1930s and the droughts of the 1950s — may become the norm in the Southwest United States within decades because of global warming, according to a study released Thursday.

The research suggests that the transformation may already be underway. Much of the region has been in a severe drought since 2000, which the study's analysis of computer climate models shows as the beginning of a long dry period.

The study, published online in the journal Science, predicted a permanent drought by 2050 throughout the Southwest — one of the fastest-growing regions in the nation.

The data tell "a story which is pretty darn scary and very strong," said Jonathan Overpeck, a climate researcher at the University of Arizona who was not involved in the study.

Richard Seager, a research scientist at Lamont-Doherty Earth Observatory at Columbia University and the lead author of the study, said the changes would force an adjustment to the social and economic order from Colorado to California.

"There are going to be some tough decisions on how to allocate water," he said. "Is it going to be the cities, or is it going to be agriculture?"

Seager said the projections, based on 19 computer models, showed a surprising level of agreement. "There is only one model that does not have a drying trend," he said.

Philip Mote, an atmospheric scientist at the University of Washington who was not involved in the study, added, "There is a convergence of the models that is very strong and very worrisome."

The future effect of global warming is the subject of a United Nations report to be released today in Brussels, the second of four installments being unveiled this year.

The first report from the Intergovernmental Panel on Climate Change was released in February. It declared that global warming had become a "runaway train" and that human activities were "very likely" to blame.

The landmark report helped shift the long and rancorous political debate over climate change from whether man-made warming was real to what could be done about it.

The mechanics and patterns of drought in the Southwest have been the focus of increased scrutiny in recent years.

During the last period of significant, prolonged drought — the Medieval Climate Optimum from about the years 900 to 1300 — the region experienced dry periods that lasted as long as 20 years, scientists say.

Drought research has largely focused on the workings of air currents that arise from variations in sea-surface temperature in the Pacific Ocean known as El Niño and La Niña.

The most significant in terms of drought is La Niña. During La Niña years, precipitation belts shift north, parching the Southwest.

The latest study investigated the possibility of a broader, global climatic mechanism that could cause drought. Specifically, they looked at the Hadley cell, one of the planet's most powerful atmospheric circulation patterns, driving weather in the tropics and subtropics.

Within the cell, air rises at the equator, moves toward the poles and descends over the subtropics.

Increasing levels of greenhouse gases, the researchers said, warms the atmosphere, which expands the poleward reach of the Hadley cell. Dry air, which suppresses precipitation, then descends over a wider expanse of the Mediterranean region, the Middle East and North America.

All of those areas would be similarly affected, though the study examined only the effect on North America in a swath reaching from Kansas to California and south into Mexico.

The researchers tested a "middle of the road" scenario of future carbon dioxide emissions to predict rainfall and evaporation. They assumed that emissions would rise until 2050 and then decline. The carbon dioxide concentration in the atmosphere would be 720 parts per million in 2100, compared with about 380 parts per million today.

The computer models, on average, found about a 15% decline in surface moisture — which is calculated by subtracting evaporation from precipitation — from 2021 to 2040, as compared with the average from 1950 to 2000.

A 15% drop led to the conditions that caused the Dust Bowl in the Great Plains and the northern Rockies during the 1930s.

Even without the circulation changes, global warming intensifies existing patterns of vapor transport, causing dry areas to get drier and wet areas to get wetter. When it rains,

it is likely to rain harder, but scientists said that was unlikely to make up for losses from a shifting climate.

Kelly Redmond, deputy director of the Western Regional Climate Center in Reno, who was not involved in the study, said he thought the region would still have periodic wet years that were part of the natural climate variation.

But, he added, "In the future we may see fewer such very wet years."

Although the computer models show the drying has already started, they are not accurate enough to know whether the drought is the result of global warming or a natural variation.

"It's really hard to tell," said Connie Woodhouse, a paleoclimatologist at the University of Arizona. "It may well be one of the first events we can attribute to global warming."

The U.S. and southern Europe will be better prepared to deal with frequent drought than most African nations.

For the U.S., the biggest problem would be water shortages. The seven Colorado River Basin states — Colorado, Wyoming, Utah, Nevada, New Mexico, Arizona and California — would battle each other for diminished river flows.

Mexico, which has a share of the Colorado River under a 1944 treaty and has complained of U.S. diversions in the past, would join the struggle.

Inevitably, water would be reallocated from agriculture, which uses most of the West's supply, to urban users, drying up farms. California would come under pressure to build desalination plants on the coast, despite environmental concerns.

"This is a situation that is going to cause water wars," said Kevin Trenberth, a scientist at the National Center for Atmospheric Research in Boulder, Colo.

"If there's not enough water to meet everybody's allocation, how do you divide it up?"

Officials from seven states recently forged an agreement on the current drought, which has left the Colorado River's big reservoirs — Lake Powell and Lake Mead — about half-empty. Without some very wet years, federal water managers say, Lake Mead may never refill.

In the next couple of years, water deliveries may have to be reduced to Arizona and Nevada, whose water rights are second to California. #

Los Angeles Times
latimes.com

March 31, 2007

Southland's dry spell could get worse; Every place that supplies water to the region is dry -- a pattern that could eventually produce what researchers call the perfect drought

By Bettina Boxall, staff writer

Nature is pulling a triple whammy on Southern California this year. Whether it's the Sierra, the Southland or the Colorado River Basin, every place that provides water to the region is dry.

It's a rare and troubling pattern, and if it persists it could thrust the region into what researchers have dubbed the perfect Southern California drought: when nature shortchanges every major branch of the far-flung water network that sustains 18 million people.

Usually, it's reasonably wet in at least one of those places. But not this year.

The mountain snowpack vital to water imports from Northern California is at the lowest level in nearly two decades. The Los Angeles area has received record low rainfall this winter, contributing to an early wildfire season that included Friday's blaze in the Hollywood Hills. And the Colorado River system remains in the grip of one of the worst basin droughts in centuries.

"I have been concerned that we might be putting all the pieces in place to develop a new perfect drought," said UCLA geography professor Glen MacDonald, who has researched drought patterns in California and the Colorado River Basin over the last 1,000 years.

"You have extreme to severe drought extending over Southern California and also along the east and west slopes of the Sierra, and then you have it in the Colorado [basin], particularly Wyoming."

That, coupled with wet winter weather patterns in the southern Great Lakes region and the Northeast, MacDonald said, "is extremely similar to the last time we had a perfect drought, which was the late 1980s, early 1990s."

Thanks to a bountiful Sierra snowpack in the spring of 2006, the state's reservoirs are in good shape. Southern California water managers say they have ample supplies in reserve and are better prepared for a prolonged dry spell than they were two decades ago.

"We're watching this. We're not pleased. We're not worried, either," said Jeffrey

Kightlinger, general manager of the Metropolitan Water District of Southern California, the region's major water wholesaler. "If it does continue, we have prepared ourselves for a multiple-year drought.

"It used to be we thought that geographic diversity was enough" protection, he added. "In 1990 or so, we realized it really wasn't."

Since then, the water district has constructed a large reservoir in Riverside County and is storing more water underground.

The region's water agencies have also promoted conservation and recycling during the last two decades, steps that have helped Los Angeles keep water demand relatively flat at the same time the city added 1 million more people.

"We believe we will be able to meet the needs of the city for the coming year and beyond," said Thomas Erb, director of water resources at the Los Angeles Department of Water and Power, which gets about half of its supplies from the Eastern Sierra.

The snowpack there is shaping up to be one of the lowest since the start of record-keeping in 1940. Twice during the 20th century — in the late 1950s and the early 1980s — drought strained all three regions that supply Southern California, said Scripps Institution of Oceanography hydrologist Hugo Hidalgo, who has studied drought patterns with MacDonald. "These events have been relatively rare."

They usually last for four or five years. But "the scary part," MacDonald said, is that ancient tree ring records indicate they can go on for a couple of decades — much longer than anything experienced in modern times.

"We believe that there were much more severe and prolonged simultaneous droughts in those regions during the period 1300 AD to about 900 AD," he added. "Once you start looking back in time, you realize that what we've seen in the historical record — the last 100, 150 years, where we have good measurements — that's really nothing compared to what nature can throw at us here."

MacDonald agreed that the state's large water districts "are actually doing a good job in terms of planning for a five- to seven-year drought."

But, he warned, "if you went into a decade or longer of persistent drought that affected the Sacramento [River Basin], the Los Angeles area and the Colorado, you would end up basically taxing all of the those water storage facilities, from the dams on the Colorado to what we have here, to beyond the breaking point."

The big reservoirs in the Colorado system, which last year provided the Metropolitan Water District with 30% of its deliveries, are roughly half empty as a result of a drought that began in 2000. Federal officials have said that within a few years they may be forced to cut Colorado deliveries, although Arizona and Nevada would be hit before California,

which has senior water rights in the lower basin.

As a result of this spring's skimpy Sierra snowpack — it's at 46% of the normal statewide average — the State Water Project will reduce deliveries of Northern California water to the central and southern parts of the state, but not dramatically.

"One year a drought does not make, especially the way our system is plumbed. We have ample storage," said Arthur Hinojosa, chief of the hydrology branch for the California Department of Water Resources.

But he acknowledged that if the Sierra snowpack is poor again next winter, that "would probably create a lot of angst."

Maury Roos, the state's chief hydrologist, said that both groundwater and surface reservoir supplies were currently above average because of recent wet years — 2004-05 was the second-wettest year on record in Los Angeles. However, that "cushion won't be there for next winter" if the dry spell continues, he added.

"These dry years come often in pairs," Roos said. "There is a reasonable chance of that happening. Hopefully not."

Bill Patzert, the climatologist at NASA's Jet Propulsion Laboratory in La Cañada Flintridge, has said the Pacific is in an "El Niño-repellent" pattern that will favor drought in Southern California for years.

MacDonald said scientists have found that periods of simultaneous drought in Southern California, Northern California's Sacramento River Basin and the Colorado typically have been marked by cold water in the eastern Pacific off the North American coast — a condition that existed this winter.

A 2004 study by a team of researchers concluded that the western mega-droughts that occurred between 900 and 1300 took place during a warming period that drove up temperatures in the western Pacific, producing an upwelling of cool waters in the eastern Pacific that caused drier La Niña conditions to prevail. The researchers warned that global warming could promote severe drought in the West.

"This is the billion-dollar question," MacDonald said. "Will global warming push us into another prolonged perfect drought?" #

San Francisco Chronicle
March 29, 2007

Snow pack in Sierra is way low
Luckily, reservoirs are in good shape from last year

By Glen Martin, staff writer

Phillips, El Dorado County -- State officials took the penultimate Sierra snow survey of the season Wednesday, and the findings were grim: The snowpack is far below normal, ranging from 55 percent of average in the north to 40 percent in the south.

The Sierra provides most of the fresh water that flows down the state's rivers, and ultimately, through home faucets and farm irrigation sprinklers. There is enough water in California's reservoirs to assure normal deliveries to cities and farms through the summer, thanks to the heavy snowpack of 2005-06, authorities say.

But the runoff is expected to be scant as this season's snow melts, and that means reservoirs could be abnormally low by fall. Another dry winter could mean dire water shortages for the state.

"If next winter is similar (to this one), then we could be looking at some tight times," said Frank Gehrke, the snow survey chief for the state Department of Water Resources.

About 20 inches of fresh snow from a storm Monday night covered the meadow next to Highway 50 that is one of the department's traditional survey sites. But while the new snow was a lagniappe for die-hard skiers and snow boarders, it didn't do much to bolster the pack.

"Usually we gain snow in March, say four or five inches," said Water Resources engineering technician Dave Hart, who measured the pack with Gehrke, using a core sampler to obtain the snow and a scale to weigh water content.

"But this was an unusual year, because we lost snow in March -- about eight inches," Hart said.

Gehrke said this winter's snowpack ranks among the bottom 25 percent since such surveys began in 1930. At Phillips Station at Echo Summit, the snow depth was 35.4 inches Wednesday, containing 9.9 inches of water. That put the pack at 35 percent of average. Last year, the March pack was 114 percent of average, with 73.1 inches of snow and a water content of 32.1 inches.

Hart said several series of storms typically are needed to build the snowpack to desirable levels. That just didn't happen this year, he said.

"We'd get one storm, and that was it for a while, and then we'd get another," he said. "We were losing a lot of snow between storms."

The season's last snow survey will be taken next month, but Hart has no great hopes that things will turn around.
"It's very unlikely we could make up for what we've lost," he said.

A growing number of scientists have postulated that global warming is changing the precipitation pattern in the Sierra. Ultimately, they say, more water will fall as rain rather than snow, making it more difficult for managers to store water for the dry months.

That's because rather than flowing into reservoirs during a long spring melt, runoff water could come during intense, short deluges. Reservoirs would have to release water more frequently to prevent flooding, and it would be unsafe to store water until the end of each season.

Shortages could develop not from a lack of water, but from an inability to hold on to it.

Gehrke said it is still too early to determine if the Sierra is experiencing a major shift in climate or weather patterns.
"At this point it's all conjecture, but it's something water managers definitely are thinking about," he said.
How to hold on to water if a precipitation shift occurs? Gehrke said there are a number of possibilities, including changes in the way California's reservoirs are operated.

In any event, he said, it's nothing the state can decide on its own. Under federal law, California water managers must operate their reservoirs for flood control rather than storage until April, meaning they don't concentrate on collecting water until spring.

"That's spelled out by the U.S. Army Corps of Engineers in an operations manual, and Congress approves the manual," Gehrke said. "To change the manual, you'd literally need an act of Congress."#

Los Angeles Times
latimes.com

March 24, 2007

Deadline set on permits for delta pumping; Judge threatens a halt unless the state gets permission to kill endangered fish. Officials cite the economic effect of a shutdown

By Bettina Boxall, staff writer

A Superior Court judge has given the state two months to get environmental permits in the Sacramento-San Joaquin Delta or he will shut down the massive Northern California pumps that kill endangered fish in the process of supplying the Southland with much of its water.

State officials vowed to fight the ruling, predicting dire consequences for the California economy if the pumping stopped.

"It would be unacceptable to curtail all deliveries to the State Water Project," said Department of Water Resources Director Lester Snow, adding that the project supports a $300-billion share of the state's economy.

"That's a lot of farm jobs, industrial jobs and homes."

The delta supplies 60% of the water distributed by the Metropolitan Water District of Southern California, the region's major water wholesaler.

Although the state will almost certainly find a way to keep the pumps operating at some level, Thursday's ruling by Alameda County Superior Court Judge Frank Roesch could force reductions in the flow of water to the south.

It is also likely to move the state another step closer to dramatically overhauling the way it manages water shipments between Northern and Southern California.

"There are obviously things that are going to have to be done," said Bill Jennings, executive director of the California Sportfishing Protection Alliance, which filed the environmental lawsuit in which the judge ruled. "It's no longer business as usual."

The judge agreed with the argument by Jennings' group that the Department of Water Resources has never gotten the necessary authorization from the California Department of Fish and Game to kill threatened and endangered fish at the delta's Harvey O. Banks pumping operation. The operation forms the heart of the State Water Project that supplies urban Southern California.

The decision comes at a time of escalating concern over the fate of the delta east of San Francisco and its rapidly declining fish populations.

The tiny, native delta smelt has sunk to record lows during the last three years, and introduced species and native salmon are also struggling.

Research suggests that the pumping operation is a leading cause of the decline in fish, if by no means the only cause.

Despite an elaborate, expensive screening process, fish die at the pumps. To keep salty San Francisco Bay water away from the pumps, the project has altered the delta's natural salinity levels. The pumps are so powerful that they can reverse the flow of water in the channels that crisscross the delta.

Changes in the pumping regimen intended to protect spawning fish appear simply to have shifted mortality — killing smelt before they can spawn, or killing the young.

Though the judge's warning does not signal an immediate crisis for water managers, they are taking it seriously.

"We see this as a strong signal by the judge," said Jeffrey Kightlinger, the water district's general manager.

The court order, he said, is another sign that "transporting water through the delta is simply not sustainable in the long run."

Kightlinger said the water district could tap a large reserve if the pumping is stopped and would not have to resort to immediate rationing.

But, he said, "We'd hate to use that up."

Kightlinger added, "We will be working with the state very hard to try and make sure they do not shut the pumps."

The judge's ruling is the latest development in more than a decade of environmental fights and government programs to fix the troubled delta, a sprawling area that is California's water crossroads.

"This is a very important event. It really is," Barry Nelson of the Natural Resources Defense Council said, calling the opinion a landmark.

State officials learned of the decision Friday and in a hastily called news conference said they would ask the judge to give them more time to meet his demands.

They also disputed the judge's finding that they had never obtained the proper authorizations to kill fish under the state Endangered Species Act. #

deseretnews.com

March 8, 2007

Colorado River drought plan set for public review; Lakes Mead, Powell at lowest level in a century

By Nancy Perkins, staff writer

ST. GEORGE — Six years of drought have dropped the Colorado River reservoirs of Lake Mead and Lake Powell to their lowest level in nearly 100 years of recorded history, according to the U.S. Bureau of Reclamation.

A plan that would help the federal agency coordinate water delivery during such extreme shortages at the two reservoirs is now ready for public review. The draft environmental-impact statement poses four possible action alternatives, plus a no-action choice. Bureau staff, five federal agencies, water-rights stakeholders, environmental organizations and other interested parties assisted in drafting the plan.

"The seven basin states of the Colorado River not too many months ago were ready to turn loose their lawyers and begin the battle of the titans" over water rights, said Mark Limbaugh, Assistant Secretary of Water and Science with the Department of the Interior. "Since then, the biggest turnover I've ever seen has taken place. They are now working together to share shortages, better manage reservoirs and make it through the tough times we know are ahead of us."

Limbaugh spoke this week in St. George to more than 650 people attending the Utah Water Users Convention.

"This is history-making," said Limbaugh. "The Secretary of the Interior will choose an alternative, and a record of decision will set forth the guidelines on how to manage water shortages and retain the water rights they have."

Over the past six years, water levels at Lake Powell and Lake Mead dropped from nearly full to less than 60 percent of capacity at the end of 2006, according to the bureau. No federal guidelines are currently in place to define the circumstances of when and how the annual amount of water available would be reduced to the states holding water rights in the Colorado River.

The states holding water rights are Utah, Wyoming and Colorado as the Upper Division, while Arizona, New Mexico, Nevada and California make up the Lower Division states.

"The West has always had drought in one way or another," said Limbaugh. "That's why we have reservoirs. We're in a new era in water management. We need to manage like we

are in a drought every year. We need to save for the future. We can't go back to complacency."

The primary purpose of developing the drought guidelines is to improve management of the Colorado River by considering trade-offs between frequency and magnitude of any reductions in water supply. The plan developers also wanted to consider the effects of water storage in the two reservoirs on supply, power production, recreation and other environmental resources.

And the planners aimed to provide the Lower Division states a greater degree of predictability when it comes to water delivery during a drought, as well as additional methods of storage and delivery of the water supplies in Lake Mead.

Copies of the Draft EIS are available at the Bureau of Reclamation's Web Site at usbr.gov/lc/region/programs/strategies.html. The public review period for the document ends April 30, 2007. A public hearing on the plan is scheduled April 5 from 6 p.m. to 9 p.m. at the Hilton Salt Lake City Center, 255 S. West Temple. #

ContraCostaTimes.com

Feb. 26, 2007

Delta woes may whet water war

By Mike Taugher
CONTRA COSTA TIMES

An environmental crisis could disrupt water supplies throughout California for the first time since the early 1990s, threatening to end the long cease-fire in the state's water wars.

A dry winter, devastated fish populations and recent scientific research together could force state water officials to cut Delta water deliveries to San Joaquin Valley farms and Southern California cities.

Already this year, water managers and environmental regulators are forecasting the possibility that much more water than is available will be needed to protect fish and prevent pushing Delta smelt closer to extinction.

"We'll consider just about everything in terms of how we get through this," said Jerry Johns, deputy director of the state Department of Water Resources. "Making water available in an uncompensated manner, these things are controversial."

Not since a drought in the early 1990s -- a period when some of the Delta's salmon and smelt populations were added to the lists of threatened and endangered species -- have water supplies been so threatened because of the needs of Delta fish.

Water officials are preparing to take the unprecedented step of dipping into a nearly $10 million emergency water-buying fund in the coming weeks. So far, even that does not appear to be enough to meet the needs that Johns' department has forecast.

In order to use those funds, state officials would have to convene a panel of scientists to make recommendations to wildlife regulators. Regulators would then have to conclude that Delta smelt are "nearing" a state where they are in jeopardy of extinction.

"We have those science folks ready to go," Johns said.

If the fund is inadequate to purchase enough water, officials could then consider curtailing water deliveries.

"I believe we have a risk of losing water," said Tim Quinn, vice president of the Metropolitan Water District of Southern California, which delivers water from the Delta

and the Colorado River to 18 million people in Southern California. "We've just been through a period of relative tranquillity. ... The next couple of years are going to be tough sledding."

A series of significant storms could still avert a clash this year, but water experts on all sides agree that, without major changes, California's reliance on Delta pumping is unsustainable.

The pinch on water supplies comes as state agencies are beginning a yearlong review of how to manage the Delta to improve its ecological health and ability to deliver water.

"If the way in which we operate the water supply system is done right and the imperiled fisheries finally get the water they need, this could be a sea change in how we manage the Bay-Delta for wildlife and people," said Ann Hayden, a water resources analyst at Environmental Defense in Oakland.

The budding water supply conflict this year could increase pressure to permanentl y reduce Delta water supplies to farmers and cities or to build a peripheral canal. Such a canal or pipeline would circumvent the sensitive Delta by taking water out of the Sacramento River upstream and funnel it to Southern California.

"Conflict is serving various agendas for various parties," said Contra Costa Water District assistant general manager Greg Gartrell. "Some think it will result in reduced exports, others that it will help argue for a (peripheral canal)."

Delta fish populations collapsed beginning in 2002, and researchers are still trying to provide a detailed explanation. But they are relatively certain that it is due to some combination of pumping, invasive species and pollution.

Last fall, researchers presented work suggesting that the massive pumps near Tracy, which take out 6 million acre-feet of water a year, or enough for about 12 million households, were playing a bigger role in the smelt's decline than previously thought.

One of those studies said lots of Delta smelt are killed if the pumps run so hard at certain times that they reverse the flows of two Delta rivers, Old River and Middle River.

In light of that study, water officials beginning in mid-January limited the speed at which those rivers run uphill. In doing so, they were forced to deplete an "environmental water account," a fund that is used to reimburse water users when the pumps are slowed to protect fish.

Financed with $30 million in state bonds, to be repaid by taxpayers over a 30-year period, the environmental water account is now dry for the year and water officials are running up a debt that will have to be repaid next year.

Another finding presented last fall suggested that it is more important to protect the first Delta smelt to spawn, whose offspring are stronger and healthier, instead of the fish that spawn later in the spring. That means water managers might have to curtail pumping in March, when the first smelt normally spawn -- a decision they will face in the coming weeks.

Mike Taugher covers natural resources. Reach him at 925-943-8257 or mtaugher@cctimes.com. #

The San Diego Union-Tribune.

February 21, 2007

Report: Climate change, population growth could overwhelm Colorado River

By Mike Lee
UNION-TRIBUNE STAFF WRITER

SAN DIEGO – Climate change and soaring population growth across the Southwest threaten to overwhelm the main water source for tens of millions of people, the National Research Council said Wednesday in a major report that synthesized decades of research on the Colorado River basin.

The potentially affected areas include San Diego County, which received about 60 percent of its water from the river last year.

The report said regional droughts may be longer and more severe than previously predicted, even before accounting for global warming. Its authors added that evidence strongly suggests that worldwide temperature increases will further reduce the river's flows.

"This will inevitably lead to increasingly costly, controversial and unavoidable trade-offs," said the study, which was released by the National Research Council, a branch of the National Academies.

The gloomy findings substantiate growing concerns among water managers in Southern California. They also highlight the need for ways to deal with climate change while California tries to reduce its impacts.

Last year, a report on the State Water Project – the other main source of San Diego County's water – also forecasted increasing difficulty in meeting competing demands for fish, farmers and cities in the face of global warming.

"It's not something that we can bide our time until we retire," state water chief Lester Snow said at a climate-change conference a few weeks ago. "We need to manage it now. We're not doing a particularly good job."

Several efforts are ramping up locally and statewide to address the changing water dynamics across the West. In Sacramento, Gov. Arnold Schwarzenegger is proposing new dams to store mountain runoff in Northern California. Down south, the San Diego County Water Authority is diversifying its water sources and promoting a new outdoor water-conservation program.

But Wednesday's report suggested that current efforts aren't enough and that future weather patterns could force substantial changes in how water is divvied up.

"There is no technical cure-all or panacea capable of resolving the region's increasing water supply-demand tensions," it said.

The sobering picture was put together using dozens of research papers on the Colorado River basin, which covers some 240,000 square miles in seven states and Mexico.

Studies of tree rings show that the Colorado River's ancient history includes long periods when the water levels were higher and lower than they have been in modern times. Specifically, the report said that the 1922 agreement that apportions the river's water was based on exceptionally wet years while recent years have been notably dry.

Global warming is likely to compound historic water variations, the national science panel said. Several climate models show a warmer future for the Colorado basin, where temperatures have risen markedly in recent decades.

Continued climate changes are expected to have several effects on water in the Southwest. The include increasing evaporation, growing public demand, decreasing snowpack and more extreme droughts and flooding.

▪ Mike Lee: (619) 542-4570; **mike.lee@uniontrib.com**

Associated Press – February 27, 2007

COLORADO RIVER

Scientists say chances of river shortage rising

TUCSON, Ariz. (AP) - Scientists and public officials fear water from the Colorado River will run short more quickly than previously predicted because of booming population growth and drought.

There's a 10 percent chance of shortages in four to five years, and a 25 percent chance the river will run short between 2020 and 2025, according to two prominent water officials in Arizona.

"I have no doubt that within the next five to 10 years, we will be in a shortage," said David Modeer, Tucson Water's director and a member of the three-county board that manages the Central Arizona Project, which diverts water from the Colorado River to Arizona.

"It does not look good," Modeer said.

Larry Dozier, general manager of the Central Arizona Project, said when the shortages happen, they would not reduce water deliveries to cities.

Rather, he said it would primarily affect non-American Indian farms that are lower on the pecking order for getting water from the Central Arizona Project.

But Dozier said the pain from shortages should be eased, if not eliminated, because the state has been buying excess Central Arizona Project water and storing it in the ground for the past decade.

Originally, scientists who conducted a 1995 federal study predicted states would lose no more than 3 percent of their river supplies even in the worst drought year.

Instead, in the time since the study, Lake Powell and Lake Mead carried less water than had been predicted for the worst possible drought, users took more water than expected, and the river's flow was weaker than expected.

Ben Harding, an engineer and one of the authors of the 1995 study, said the Colorado River's woes are a "system drought," caused by the huge scale of the Colorado's reservoir system that 25 million people rely on for water, and by population growth that has come to rely on it.

"The bigger the reservoirs that you build, the bigger the system you build, the more sensitive it becomes to droughts (and) the longer it takes to recover," Harding said. "You have a bigger hole to fill."

Harding said the study's authors assumed the worst-case drought would be a very rare event and probably many years off and that the high cost of pumping water 300 miles uphill to Tucson from the Colorado would reduce the demand for the project's water.

"The current drought, however, has caught water managers unprepared," Harding wrote.

Carlsbad Seawater Desalination Project

Carlsbad Desalination Project

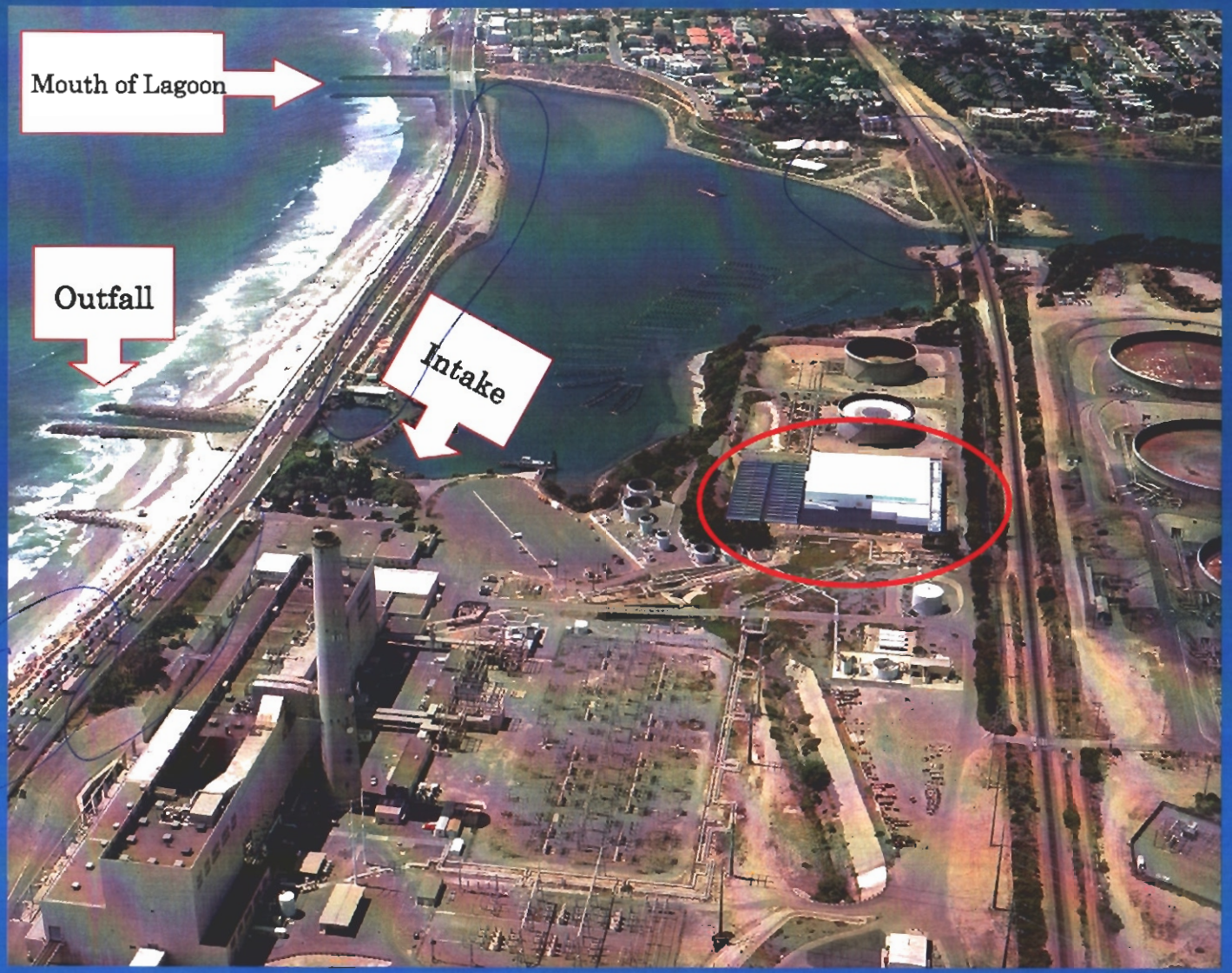
Location:	*San Diego County - City of Carlsbad*
Site:	*60-Year Lease With Cabrillo Power*
Estimated Cost:	*$270 Million*
Quantity:	*50 MGD (56,000 AFY)*
Quality:	*High (250 - 350 mg/L TDS)*
Reliability:	*Drought-Proof Supply* *Redundant Capacity*
Price:	*Not to Exceed Imported Water Cost Plus MWD Incentive*
Schedule:	*On-Line 2009*

Encina Power Plant in Carlsbad, California

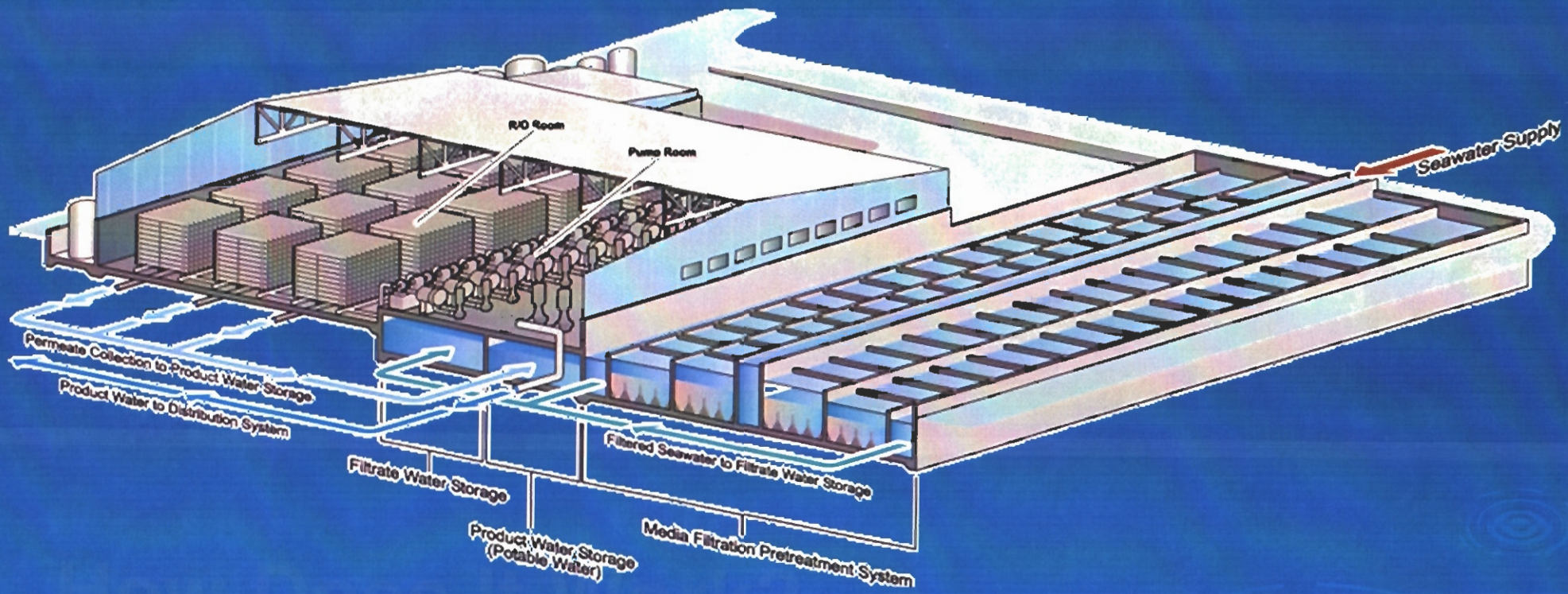
Project Objectives

- Public Benefits
- Meet Water Supply Needs
- Water Supply Reliability
- Enhance Water Quality

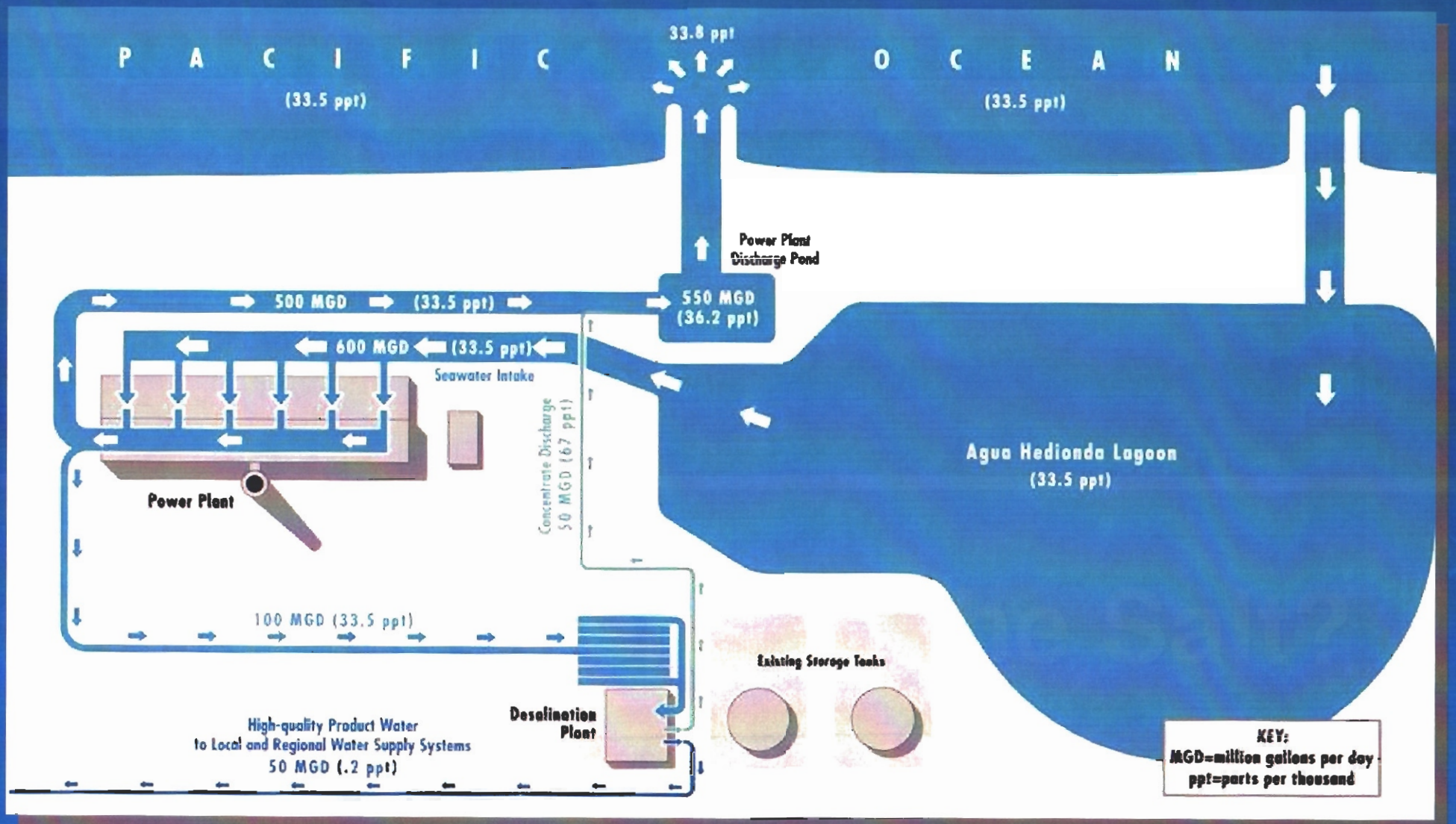
Site Configuration



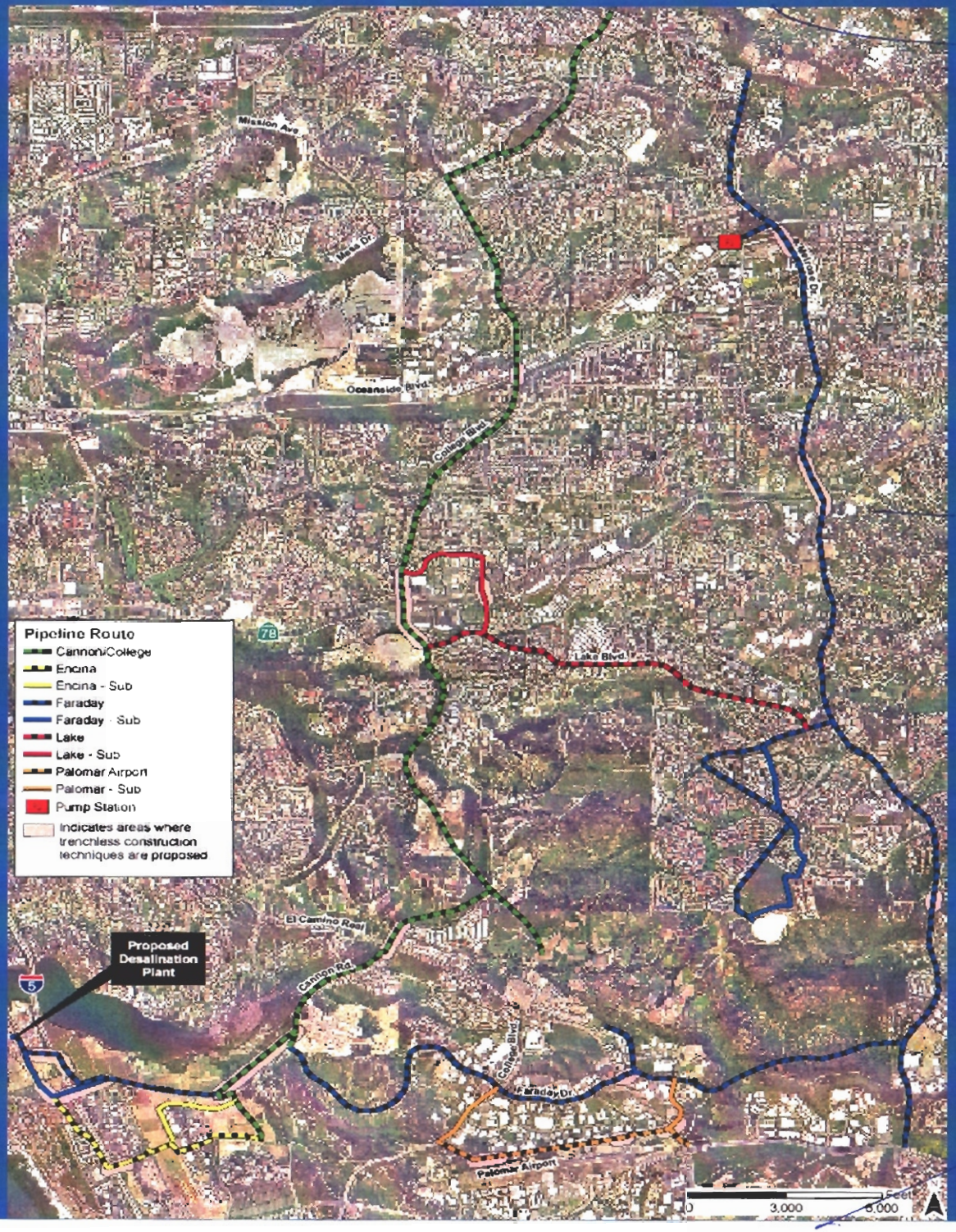
How Does It Work?



What Happens to the Salt?



Demonstration Plant



existing pipelines

Project Milestones

- Environmental Impact Report Certified
- Local Land Use Permits Approved
- NPDES Permit Approved
- Coastal Development Permit Under Review
- Long-Term Water Purchase Agreements for 60% of Plant Output

Available Supply

- Plant Capacity 56,000 AFY
- Existing Water Purchase Agreements
  - Carlsbad MWD 21,000 AFY
  - Valley Center MWD 7,500 AFY
  - Rincon Del Diablo MWD 4,000
- Available Supply – 23,500 AFY

Public Agency Partners' Objectives

- Achieve Water Reliability Targets
- Enhance Water Quality
- Price Predictability / Affordability
- Tax Increment and Other Economic Benefits
- Manage Land Use Decisions

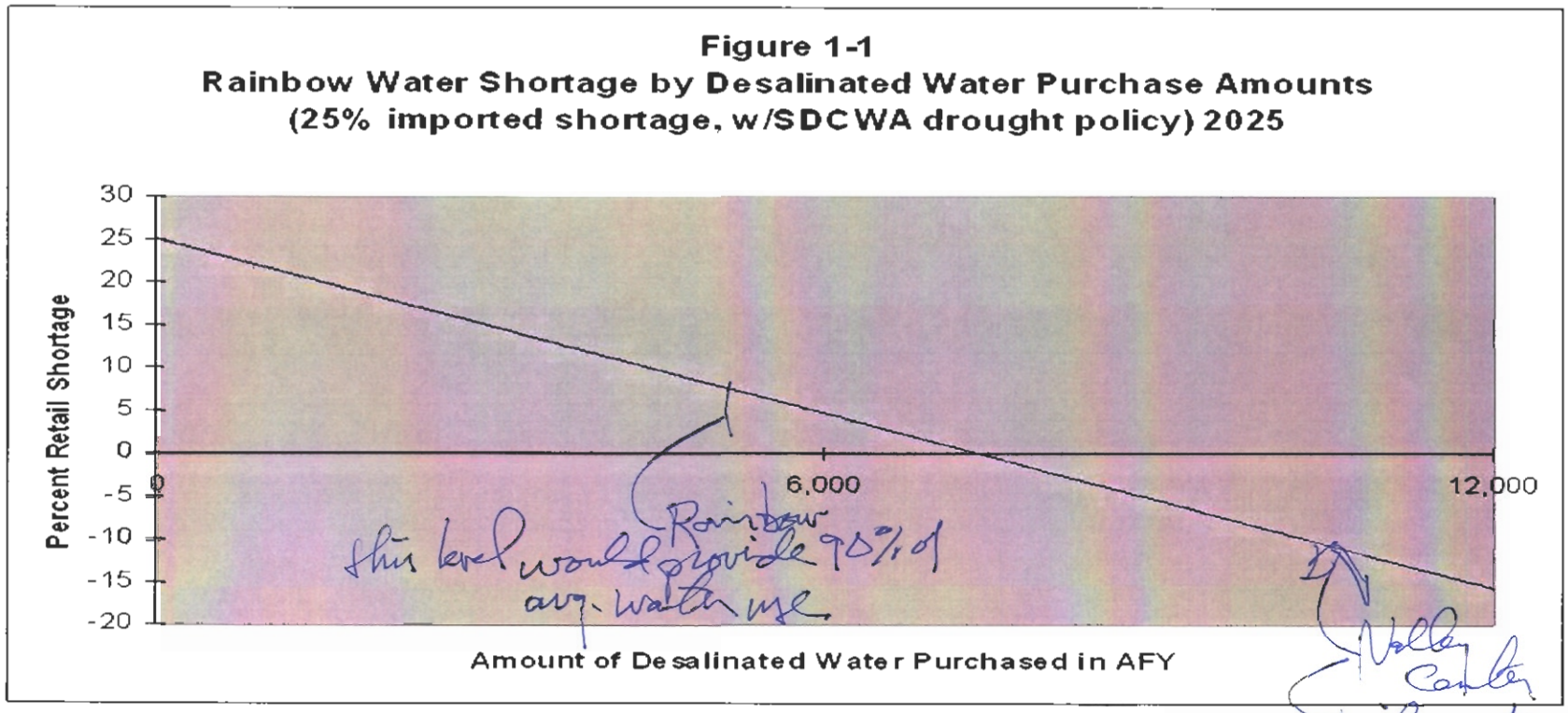
Business Arrangements

- Long-Term Water Purchase Agreement
  - Public Agencies
    - Control water allocation and use
    - Retain land use control and tax increment
    - Protected by long-term, fixed price contract
  - Poseidon
    - Assumes risk of development, permitting, financing, construction and operations

Water Purchase Agreement Terms

- Poseidon
  - Quantity
  - Quality
  - Reliability
  - Price
- Public Agencies
  - Pay for water delivered per specifications

Improved Water Supply Reliability



Project Benefits

- New Drought-Proof Water Supply
- Reduced Pressure on Colorado River and Sacramento-San Joaquin Delta
- Dedication of Lagoon and Ocean Front Property for Public Access, Recreation and Marine Research
- Improved Water Quality
- Affordable and Predictable Price
- Increased Tax Increment within Redevelopment Project Area
- Environmentally Sensitive Solution
- Strong Public Support

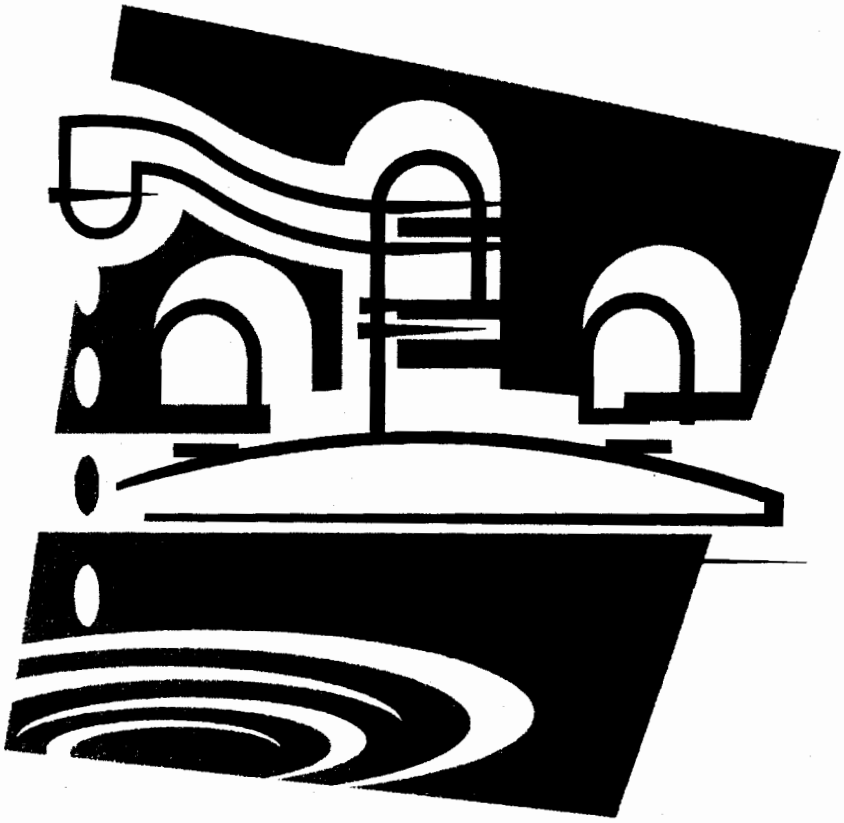
POSEIDON RESOURCES

EXHIBIT 3

Carlsbad Municipal Water District

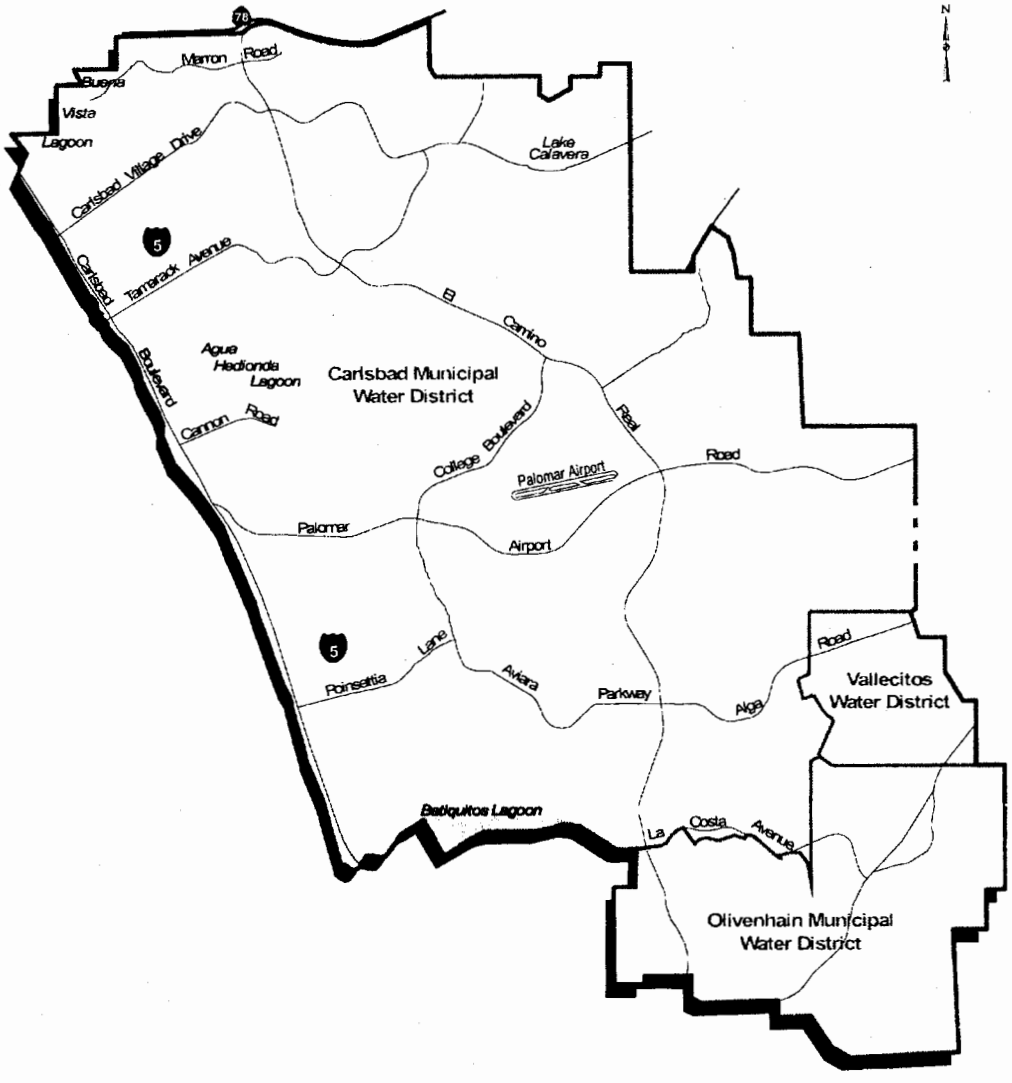
2005 URBAN WATER MANAGEMENT PLAN

December 2005



November 2, 2005 Draft

10



CMWD Service Area Boundaries

2.4

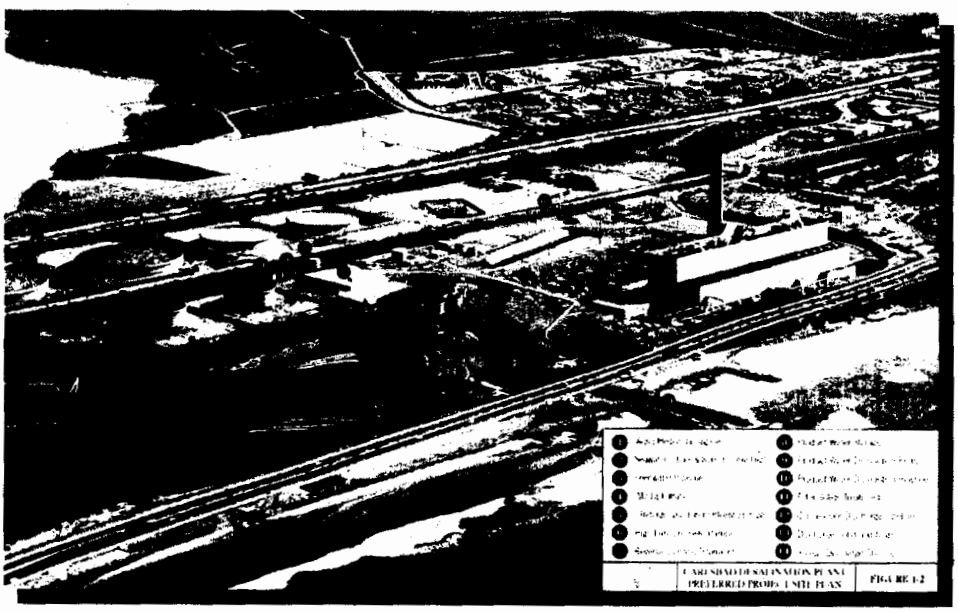
located because it was buried as a result of the Army Core Of Engineers improvements to San Luis Rey River.

Seawater Desalination

In 1999, Poseidon Resources Corporation approached the Carlsbad Municipal Water District with a proposal to perform a feasibility study on seawater desalination in Carlsbad. In March 2000, the District's Board of Directors instructed staff to prepare a report on this proposal, including the benefits and impediments to such a project. In short, numerous beneficial aspects to developing seawater desalination project were identified, but the report also identified many serious and critical issues that must be addressed and resolved before Carlsbad could obtain a cost effective, reliable, drought- proof water supply from this source.

The purpose of the staff report was not to attempt to answer the many questions presented or solve any of the issues presented. The purpose was to identify most of the issues known at the time in order to put the potential for seawater desalination into perspective.

Poseidon Resources completed their feasibility study in July of 2001. This study showed that construction of a 50 MGD Seawater Desalination Facility was feasible and recommended construction of this facility on the Encina Power Plant site (owned by Cabrillo Power). This site offers advantages of an existing seawater intake, a method of brine discharge and an existing Regional Board discharge permit.



ENCINA POWER PLANT - SITE OF PROPOSED SEAWATER DESALINATION FACILITY

28

As a result of their feasibility study, Poseidon offered a proposal to construct a 50 MGD Seawater Desalination Facility and to sell, to Carlsbad, 10 MGD (or more) of desalinated seawater. The proposal stated that Poseidon would be responsible for marketing any of the water not purchased by Carlsbad. Poseidon offered to sell the remaining water to the Vallecitos Water District, the Vista Irrigation District, the City of Oceanside, the San Dieguito Water District and the Olivenhain Municipal Water District. They also offered to sell the remaining water to the San Diego County Water Authority (SDCWA).

The Carlsbad Municipal Water District (CMWD) Board recognized early on that there were two paths that could lead to the development of a desalination plant in Carlsbad. One would be a public project owned and operated by San Diego County Water Authority (SDCWA), developed through the normal public works process of design, bidding, government oversight, distribution, and pricing. The other would be a private project developed by Poseidon, using private procurement methods and operating practices, and selling water to public agencies through both public and private water lines at prices negotiated as part of a water purchase agreement.

Since June 2000, Carlsbad staff has worked with both SDCWA and Poseidon to develop agreements that would define how these two possible futures could become one reality. And, although negotiations with SDCWA were on hold between January and August 2004, staff continued working with Poseidon Resources on the development of a Water Purchase Agreement (WPA).

The WPA provides Carlsbad the right to purchase up to 25 Million Gallons Per Day (MGD) of water from the desalination plant. This water will meet the District's water quality standards, and be provided to the CMWD at specified delivery points. With regard to *Reliability,* the agreement provides that if the plant delivers less than a specified amount of water each year, CMWD will receive a payment of liquidated damages from Poseidon. In addition, the agreement is conditioned on CMWD receiving a backup supply of water from SDCWA to assure that local residents water needs are covered at all times.

The guiding principal in negotiating this agreement has been CMWD's direction that Carlsbad residents should pay no more for desalinated water than they would otherwise pay for water delivered from SDCWA. The pricing plan that is currently reflected in the draft WPA achieves CMWD's goals with regard to the cost of water.

Since the WPA is based on a Take-If-Delivered concept where CMWD only pays for water that is actually delivered by Poseidon, there are no payments to Poseidon that are not directly tied to the delivery of water.

The WPA includes a number of conditions that must be satisfied prior to CMWD having an obligation to purchase water from the project. These include the following:

1. *CEQA*
    a. CWMD cannot commit to purchase any water until all California Environmental Quality Act (CEQA) processes are complete
    b. If the CEQA process has not been completed within 24 months of the date of the WPA, either party may terminate the agreement.
2. *Water Rates* - If Poseidon has determined that the water rates set by the pricing section of the agreement are insufficient to implement the project; Poseidon may terminate the agreement.
3. *Applicable Laws and Permits* - The agreement requires that Poseidon or its subcontractors must have complied with all applicable laws, and received all necessary approvals and permits.
4. *Sale of Remaining Output* - If Poseidon has not entered into agreements to sell the remaining output of the project within 24 months; either party may terminate the agreement.
5. *Delivery Points* - If the parties have not agreed on delivery points within 24 months of the WPA date either party may terminate the agreement.
6. *Delivery Regime* - If the parties have not determined an acceptable delivery regime within 24 months of the WPA date, either party may terminate the agreement.
7. *Delivery Charge* - The parties must agree on a mutually acceptable delivery charge.
8. *Monitoring and Testing* - The parties must develop a mutually acceptable system testing and monitoring protocol.
9. *Subsidy* - If CMWD has not received the $250 per acre-foot MWD subsidy (or an equivalent subsidy, from other sources) the agreement may be terminated.
10. *Development Agreement* - The agreement is conditioned on the parties entering into a Development Agreement.
11. *Backup Water Supply* - The agreement is conditioned on Carlsbad receiving an acknowledgement from SDCWA that CMWD is eligible to receive backup water when needed.
12. *Cabrillo Consent* - Within 24 months, Cabrillo Power must have provided the necessary consent allowing the CMWD to exercise its rights under this agreement.

The long-term fiscal impact of this agreement is difficult to project. If the project is successful, CMWD will be purchasing high-quality water from the desalination plant at a price that is competitive with present SDCWA supplies.

Extensive testing protocols have been designed into the WPA to identify any potential problems before water reaches CMWD's system, and to assure that adjustments are made to the water quality to eliminate any potential for system damage.

It is unlikely that CMWD will reduce its capital improvement program or other water system investments due to this agreement. The need to rely on SDCWA for backup water, and the relative uncertainty that still surrounds this project requires that CMWD continue to develop its ability to receive traditional water supplies as well as desalinated water.

There is currently no plan to invest CMWD money in the development of this project. The WPA anticipates a totally private project constructed using private financing. If grant funds become available to fund portions of the, project, CMWD may reconsider this position.

CMWD may elect to construct and own certain portions of the water distribution system. Any decision to change the water system Capital improvement Program will be based on a future analysis of the effect of desalinated water deliveries on existing system design, and will be subject to Board approval.

The potential for desalinated seawater use in the CMWD service area is shown in Table 3-1.

Again, the CMWD Board also recognized on that there could be a public project owned and operated by the SDCWA, developed through the normal public works process of design, bidding, government oversight, distribution, and pricing.

As a result, the SDCWA and CMWD also reached an inter-agency agreement called an 'Agreement Memorializing Certain Understandings And Establishing A Framework For Cooperation'. This agreement commits the parties: the San Diego County Water Authority, the City of Carlsbad, the Carlsbad Housing and Redevelopment Commission and the Carlsbad Municipal Water District, to certain intergovernmental, financial and other matters relating to the Regional Desalination Project, if the SDCWA determines to proceed with the project.

As part of this Agreement, the SDCWA agrees to sell the CMWD up to 5,000 acre-feet of desalinated seawater annually. This water purchased by the CMWD will be deemed and designated as the "District's Local Water" and will be additional to any water the CMWD may receive as a member agency of the SDCWA.

In either case described above, the CMWD will increase its water supply reliability substantially with the implementation of a seawater desalination project in the City of Carlsbad.

Recycled Water

The Carlsbad Municipal Water District began serving recycled water in 1993. The Meadowlark Water Reclamation Facility (owned and operated by the Vallecitos Water District) and the Gafner Wastewater Treatment Plant (owned and operated by the Leucadia County

CEMENT MASONS LOCAL NO. 500

O.P. & C.M.I.A. - A.F.L.-C.I.O.

1605 N. SUSAN STREET • SANTA ANA, CALIFORNIA 92703
OFFICE PHONE: (714) 554-0730 • FAX: (714) 265-0780
www.cementmasonslocal500.org

Art Martinez, Jr.
Financial Secretary-Treasurer
Business Manager

April 11, 2007

RECEIVED
APR 13 2007
CALIFORNIA
COASTAL COMMISSION

Pat Kruer, Chairman
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, California 94105

Coastal Commission staff has received a copy of the enclosed communication

Re: Coastal Development Permit Application # E-06-007
Huntington Beach Seawater Desalination Project

Dear Chairman Kruer:

Cement Masons Local Union No. 500 represents Union members living in the Orange County area including Huntington Beach. On behalf of those members and their families, we strongly recommend that the California Coastal Commission support the construction of the Huntington Beach Water Desalination Facility by Poseidon Resources Corporation.

Not only is our naturally-arid Southern California region in dire need of an alternative source of clean drinking water, this project is important because it will create fair-paying, stable jobs for our residents.

Our union's main concern is to help workers build better lives and futures for their families, and this project will fulfill part of that goal by bringing in new employment opportunities to the Huntington Beach area.

Whether it is through construction of the buildings or maintenance and operation of the facility, men and women will have the opportunity to achieve their American Dream of working hard and supporting their families.

Although we are concerned about creating jobs, we are equally concerned about not damaging our environment. We can say with full confidence that this project has passed strict scientific scrutiny that confirms it is not harmful to our environment.

Enabling citizens to attain their goals and keep their environment safe should be top priorities, and that is why I am urging the Commission to consider this proposal.

Sincerely,

Art Martinez Jr.

Art Martinez Jr., Financial Secretary
Business Manager
Cement Masons Local Union No. 500

AMjr:aa
opeiu#537
afl-cio

cc:

Chairman Pat Kruer
Commissioner Steve Blank
Commissioner Steve Kram
Vice Chairwoman Bonnie Neely
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Trent Orr
Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President Pro Tem Don Perata
Secretary Mike Chrisman
Mr. Barry Sedlik
Director Lester Snow
Senator Dennis Hollingsworth
Senator Jim Battin
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
Senator Tom Harman
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Mimi Walters
Assemblymember Martin Garrick
Assemblymember Lori Saldana
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas
Assemblymember Bob Huff
Assemblymember Jim Silva
Assemblymember Van Tran
Assemblymember Chuck DeVore
Assemblymember Todd Spitzer
Assemblymember Mike Duvall
Commissioner John Garamendi
Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Jessica Jones

Los Angeles / Orange Counties Building and Construction Trades Council

Affiliated with the Building & Construction Trades Dept., AFL-CIO

RICHARD N. SLAWSON
Executive Secretary

1626 Beverly Boulevard
Los Angeles, CA 90026-5784
Phone (213) 483-4222
(714) 827-6791
Fax (213) 483-4419

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APR 11 2007
CALIFORNIA
COASTAL COMMISSION

April 9, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Coastal Commission staff has received a copy of the enclosed communication

Re: Coastal Development Permit Application #E-06-007
Huntington Beach Seawater Desalination Project

Dear Chairman Kruer:

The Los Angeles/Orange Counties Building and Construction Trades Council represents affiliated Local Unions and Councils in the Construction Industry. On behalf of the (130,000) Craftmen and Women of those affiliated Local Unions/ Councils, we strongly recommend that the California Coastal Commission support the construction of the Huntington Beach Water Desalination Facility by Poseidon Resources Corporation.

Not only is our naturally-arid Southern California region in dire need of an alternative source of clean drinking water, this project is important because it will create fair-paying, stable jobs for our residents.

Our union's main concern is to help workers build better lives and futures for their families, and this project will fulfill part of that goal by bringing in new employment opportunities to the Huntington Beach area.

Whether it is through construction of the buildings or maintenance and operation of the facility, men and women will have the opportunity to achieve their American Dream of working hard and supporting their families.

Although we are concerned about creating jobs, we are equally concerned about not damaging our environment. We can say with full confidence that this project has passed strict scientific scrutiny that confirms it is not harmful to our environment.

Enabling citizens to attain their goals and keep their environment safe should be top priorities, and that is why I am urging the Commission to consider this proposal.

Sincerely,

Jim Adams
Council Representative

cc: Please see next page

cc:

Chairman Pat Kruer
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Commissioner Steve Kram
Vice Chairwoman Bonnie Neely
Commissioner Khatchik Achadjian
Commissioner Sara Wan
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Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
Senator Tom Harman
Assemblymember George Plescia
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Commissioner Cindy Aronberg
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Ms. Barbara Dugal
Ms. Judy Brown
Ms. Jessica Jones

CHAMPS Condominium Homeowner Association Management Professional Services
The Kelly Group

RECEIVED
APR 20 2007
CALIFORNIA
COASTAL COMMISSION

March 29, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

Subject: Carlsbad Desalination Project - Coastal Commission staff have also received a copy of this letter.

Dear Members of the Commission:

Diane Richards
James Strickland

My name is Josh Board and I am representing the Bristol Cove Homeowners Association, 4525 Cove Drive in Carlsbad, CA. Our HOA has studied the proposed Carlsbad Desalination Plant and we would like to offer our unconditional support of the project.

Bristol Cove is a beautiful place to live, in part, due to our close proximity to the Agua Hedionda Lagoon. Any threat to the pristine condition of the lagoon and its many recreational uses is a direct threat to the homeowners association and our quality of life. We are specifically concerned about who will be responsible for maintaining the lagoon's favorable conditions if the power plant goes away as some have suggested will be the case. It seems that the desalination plant has a vested interest in a clean and healthy water source and would assume responsibility for keeping the Lagoon open to the Pacific Ocean. In the absence of a steward to maintain the Lagoon, the opening to the Pacific Ocean would close in a few short years and the Lagoon will revert back to the non-productive state it was in prior to 1950.

We are also alarmed by the growing number of newspaper reports about the impact global warming will have on our water supply. The fact that our region is almost 100% dependent on imported water could spell disaster for the future if steps are not taken soon to meet the needs of our existing population. It is a relief to me that the City of Carlsbad is being proactive in addressing this issue instead of waiting until the declining water supply problem grows to crisis proportions.

After studying the project and its environmental reports, I believe that the desalination project will bring high-quality, reliable water to our city with no real environmental impacts to the ocean and project site. The desalination plant is needed to watch over the lagoon and take responsibility for its health and wellbeing. I want to applaud the City of Carlsbad and Poseidon Resources for working together to make this happen.

I hope that you and your fellow Commissioners share our urgency and concern about our water supply and the future of the precious marine resources supported by Agua Hedionda Lagoon. Please approve this project as soon as possible.

Sincerely, Diane Richards, Secretary
Josh Board, President

Bristol Cove Property Owners Association

5731 Palmer Way, Suite B • Carlsbad, CA 92008 • (760) 603-0501 • Toll Free: (800) 407-0501 • Fax: (760) 603-0505

member
CAM
AFFILIATE MEMBER

cc.

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Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
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Mr. Barry Sedlik
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Assemblymember Shirley Horton
Assemblymember Mary Salas
Assemblymember Bob Huff
Assemblymember Jim Silva
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Commissioner Anne Sheehan
Mr. Paul Thayer
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Ms. Judy Brown
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SAN DIEGO ™
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CHAMBER OF
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February 22, 2007

Mr. Pat Kruer, Chairman
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

On behalf of the San Diego Regional Chamber of Commerce, please accept our congratulations on your appointment as Chair of the California Coastal Commission. We look forward to a proactive relationship with you.

The Chamber takes an active interest in public policy issues that affect our region and our members. We are a strong advocate for the protection of the San Diego region's environment, especially the 70-miles of coastline that define our region and fuel San Diego's economic engine. The Chamber has a long history of supporting projects that improve the reliability of the region's water supply and embrace alternative technologies.

The Chamber supports the Carlsbad Desalination Project because, coupled with ongoing water conservation and water recycling programs, it presents an environmentally responsible way to reduce our excessive dependence on imported water. Imported water is subject to drought, competing interests, endangered species issues, and as recently highlighted by the Governor in his State of the State address, the likely reduction in Sierra supply due to global warming. The Carlsbad Desalination Project incorporates adequate safeguards which address environmental issues, including management of brine discharge and the monitoring of water quality along the coast. Specifically, the Chamber believes the impact to marine life to be minimal, as no endangered or at risk species are located in waters in the project vicinity.

We have followed the progress of this project closely, including the submittal last year by Poseidon Resources of its application for a Coastal Development Permit. In our opinion, the Carlsbad Desalination Project achieves its stated objectives in an environmentally and economically acceptable manner. To that end, we have testified several times in support of the project, including permit hearings held by the City of Carlsbad and the San Diego Regional Water Quality Control Board in the past year.

On behalf of the Chamber, its 3,000 member companies and their 400,000 employees, I respectfully urge that the Commission give careful consideration to the permit application for the project.

Sincerely,

Scott D. Alevy
Vice President, Public Policy & Communications

SDA:av

cc. Commissioner Meg Caldwell
Commissioner Steve Kram
Commissioner Bonnie Neely
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
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Mr. Peter Douglas
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Speaker Fabian Nunez
Senate President Pro Tem Don Perata
Secretary Mike Chrisman
Director Lester Snow
State Lands Commission
Senator Dennis Hollingsworth
Senator Jim Battin
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Mimi Walters
Assemblymember Martin Garrick
Assemblymember Lori Saldana
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas

LAWYERS FOR
CLEAN WATER

September 15, 2006

Elizabeth Miller Jennings, Sr. Staff Counsel
State Water Resources Control Board
Office of Chief Counsel
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RE: Petition for Review of Waste Discharge Requirements (NPDES No. CA0109223) for the Poseidon Resources Corporation, Carlsbad Desalination Project, Issued by Regional Board Order No. R9-2006-0065.

Dear Ms. Jennings and State Water Resources Control Board:

The Surfrider Foundation, San Diego Chapter (hereinafter "Surfrider") and Orange County Coastkeeper ("Coastkeeper) (collectively "Surfrider") hereby petition the State Water Resources Control Board ("State Board") for review of the National Pollutant Discharge Elimination System ("NPDES") Permit No. CA0109223 ("the Permit") adopted on August 16, 2006 by the California Regional Water Quality Control Board, San Diego Region ("Regional Board"), by Order No R9-2006-0065, for discharges of pollutants to waters of the United States from the Poseidon Resource Corporation ("Poseidon")'s Carlsbad Desalination Project (CDP) discharge channel located at the Encina Power Station ("EPS") in Carlsbad, California. A copy of Order No. R9-2006-0065 is attached hereto as Exhibit A.

As issued by the Regional Board, the Permit conflicts with the policies of the State Board and the Clean Water Act ("CWA") in a number of respects. First, the Reopener Provision in the Permit is inadequate and threatens to undermine the State Board's Proposed State Wide Policy on CWA 316(b) Regulations ("316(b) Policy") before it is issued, via piecemeal permits issued by the Regional Board that are inconsistent with the State Board's 316(b) Policy and federal law.

Second, the Permit fails to adequately consider or address the impacts of the operations of the Poseidon CDP when the EPS is not operational, or in the event the EPS is shut down and demolished.

Third, the Permit conflicts with the CWA by ignoring the fundamental CWA requirement that all effluent be characterized in a Reasonable Potential Analysis ("RPA") undertaken by the Regional Board ***prior*** to determining the need for water quality based effluent limits (WQBELs) in the permit. Permits must include WQBELs for pollutants that are or may be discharged at levels that cause, have reasonable potential to cause, or contribute to a receiving water excursion above any state water quality standard. As set forth more fully below, the Regional Board has established WQBELs in the Permit without following proper procedures and performing the analyses required in the State Water Resources Control Board (State Board)'s California Ocean Plan "Ocean Plan". By failing to follow these procedures, it cannot be known whether the WQBELs in the permit are sufficiently inclusive and sufficiently stringent to ensure attainment of CWA water quality standards ("WQS"). WQS are meant to protect the water quality needed for our State's waters to be usable for fishing, swimming, drinking and irrigation water supply, wildlife habitat, and the various other beneficial uses of such waters.

Permit limits that ensure attainment of WQS and protection of healthy aquatic ecosystems are key to the CWA's scheme of ensuring that the beneficial uses of the public's waters are protected, and to promote the overarching goal of the CWA, whose purpose is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." 33 U.S.C. § 1251(a). Respecting these goals and the letter of CWA law requires the State Board to reverse the Regional Board's Permit decision with instructions to promulgate a Reopener Provision in the permit that complies with the mandates of the State Board's policies and promulgates WQBELs protective of WQS based upon a RPA that complies with the California Ocean Plan.

Surfrider, along with San Diego Coastkeeper, raised and presented the issues addressed in this Petition, as well as other issues, to the Regional Board in an August 9, 2006 public comment letter duly submitted jointly by Surfrider and San Diego Coastkeeper to the Regional Board during the applicable public comment period on the Permit and in a public hearing before the Regional Board on the Permit. The comment letter is attached to the Petition as Exhibit B. Surfrider has sent copies of this Petition to the Regional Board and to the discharger.

I. *Factual Background*

A. *Surfrider*

Surfrider is a non-profit public benefit corporation organized under the laws of the State of California dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through conservation, activism, research and

education. Surfrider and its San Diego Chapter are dedicated to this mission and to the protection of coastal water quality, watersheds, and the preservation of waves and beaches throughout San Diego County, including those in and around the City of Carlsbad. Surfrider and its members benefit directly from the protection of these natural resources by using them for diverse recreational and aesthetic enjoyment purposes. Moreover, the waters in question are an important resource for recreational and commercial fisheries. The waters also provide significant wildlife values important to the mission and purpose of Petitioner. The value of these waters includes, among other things, critical nesting and feeding grounds for resident and migratory water birds, essential habitat for endangered species and other plants and animals, nursery areas for fish and shellfish and their aquatic food organisms, and open space areas.

Surfrider's office contact information for this Petition is: Surfrider Foundation, 8117 West Manchester Ave., # 297, Playa del Rey, California 90293. Their Telephone number is (310) 410-2890, and E-mail address is: jgeever@surfrider.org to the attention of Joe Geever. Surfrider's legal counsel's contact information in this matter is as follows: Daniel Cooper, Lawyers for Clean Water, Inc., 1004 O'Reilly Avenue, San Francisco, California 94129, Telephone: (415) 440-6520, Fax: (415) 440-4155, Email: cleanwater@sfo.com.

B. ***Coastkeeper***

Orange County Coastkeeper is also a non-profit public benefit corporation organized under the laws of the State of California dedicated to the protection of water quality, watersheds, and the coastal environment. Coastkeeper's members use and enjoy coastal waters throughout Orange County and Southern California, including the coastal waters surrounding the City of Carlsbad.

Coastkeeper's office contact information is 3151 Airway Avenue, Suite F-110, Costa Mesa, CA 92626, and can be reached by telephone at (714) 850-1965 and by e-mail at coastkeeper1@earthlink.net. (Attn: Garry Brown). Coastkeeper's legal counsel's contact information in this matter is as follows: Daniel Cooper, Lawyers for Clean Water, Inc., 1004 O'Reilly Avenue, San Francisco, California 94129, Telephone: (415) 440-6520, Fax: (415) 440-4155, Email: cleanwater@sfo.com.

Using targeted administrative and legal advocacy before the State Board and regional regulators, both Surfrider and Coastkeeper play a lead role in developing sound legal standards, permits, and regulations. A key area of the groups' focus is ensuring that State and Federal environmental laws are implemented properly and enforced. Where necessary, Surfrider and Coastkeeper initiate enforcement actions on behalf of themselves and their members.

Surfrider and Coastkeeper, their members, and the general public are adversely impacted by the discharge of pollutants from the Poseidon CDP into coastal waters,

which threaten serious adverse impact on the near shore waters and aquatic ecosystems in and around the City of Carlsbad. Surfrider and Coastkeeper, their members, and the general public are also aggrieved by the Regional Board's Permit decision because the Permit authorizes the discharge of pollutants from the Poseidon CDP into coastal waters and renders these discharges of pollutants lawful under the CWA, thus beyond the public's ability to seek remedy for these discharges under the enforcement provisions of the CWA (which include action by the United States Environmental Protection Agency ("EPA"), the Federal agency primarily responsible for protection the nation's waters, and/or by citizens).

C. *Poseidon's CDP*

Poseidon proposes to construct and operate the Carlsbad Desalination Project (CDP) on a 4-acre parcel on the site of the Encina Power Station ("EPS"). Poseidon has entered into a renewable 60-year lease with Cabrillo Power I LLC (the owner and operator of the Encina Power Station) for the desalination project site. The Encina Power Station (EPS) generates up to 939 megawatts of electrical power using five team generators and one gas turbine generator. The EPS steam generators are cooled by a once through seawater flow system. EPS cooling water is discharged to the Pacific Ocean under the requirements established in Regional Water Board Order No. 2000-03.

Under the proposed CDP, a portion of the EPS cooling water effluent would be diverted to CDP for seawater desalination treatment. Poseidon proposes to use 100 MGD of EPS cooling water effluent as source water. An average daily flow of 50 MGD of fresh potable water would be produced by the CDP. Treatment processes at the CDP will consist of pretreatment, reverse osmosis desalination, and disinfection and product water stabilization. The Facility expects to have 13 reverse osmosis ("RO") units operating in parallel at the facility. One RO unit at a time is expected to be offline for membrane cleaning or maintenance. The expected average daily flow of 50 MGD of RO brine is based on the assumption that one RO unit will be down at all times for cleaning or maintenance.

The 50 MGD of fresh potable water produced by Poseidon would be piped to the City of Carlsbad potable water system for distribution to Carlsbad water customers and conveyance to adjacent North San Diego County water agencies. The production of 50 MGD of fresh potable water would result in the generation of approximately 55 MGD of combined filter backwash water and concentrated saline wastewater that would be discharged back into the EPS cooling water discharge channel for discharge to the Pacific Ocean. The discharge would contain virtually all dissolved solids and some of the suspended solids contained in the CDP intake water. Thus, the wastewater flow volumes within the EPS discharge channel would be reduced by 50 MGD, however contain a greater concentration of dissolved solids (mostly salts).

II. *Poseidon's CDP Permit Should be Overturned and Remanded to the Regional Board Because the Reopener Provision is Inadequate, WQBELs Are Not Based Upon a Proper RPA, and Because the CDP Has Not Been Properly Analyzed for Operation as a Stand Alone Facility*

A. *The Re-Opener Provision in the Permit is Inadequate and Undermines the State Board's Proposed State Wide Once Through Cooling Policy.*

On its face, the Reopener Provision in the Permit is inadequate because it contains no requirement that the Permit be re-opened in the face of either: demonstrable harm to marine ecosystems; violations of the Permit; changes in State or federal law or policies; or for the occurrence of any of the enumerated Reopener terms and conditions stated in the Permit. Instead, the Reopener Provision provides that the "Order *may be* modified, revoked and reissued, or terminated for cause including, but not limited to" ten specified causal factors or occurrences (emphasis supplied). *See* Permit, Section VI.C.1.[1] These occurrences include, among others, "[a] change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge," and further include "an effluent limitation if monitoring establishes that the discharge causes, has the reasonable potential to cause, or contribute to an excursion above an Ocean Plan Table B water quality objective."

Thus, there is no express provision *requiring* the reopening and modification, reissuance or any other action on the Permit under any of the enumerated circumstances; nor is there a requirement that the Permit be reopened once the State Board's 316(b) Policy becomes final and Poseidon's compliance with both this Policy and the federal regulations is required by law. Even assuming that the adoption of the forthcoming 316(b) Policy fits one of the enumerated circumstances set forth in the Permit's Reopener Provision, there is absolutely no requirement that the Regional Board reopen the Permit once the 316(b) Policy takes effect. This is so in spite of the fact that the State Board's 316(b) Policy has been developing for many months in concert with numerous public hearings to receive input from stakeholders and the public on its implementation, which is likely to be imminent.[2]

Besides the CDP, Poseidon is proposing several once through cooling desalination plants along the California coast. These plants will operate in tandem with power generating stations, which also require permits from the regional boards. For

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[1] It is also worth noting that the State and regional boards rarely re-open permits, with just 27 reopenings in the last 19 years. The rate of reopening is therefore approximately 1.5 per year.

[2] The draft 316(b) Policy, entitled *Scoping Document: Proposed Statewide Policy on Clean Water Act Section 316(b) Regulations* (June 13, 2006), is available on the State Board's website. Given the progress of development and hearings on the 316(b) Policy, it is entirely likely that it will be in place some time in 2007.

example, the Santa Ana Regional Board recently permitted both the AES Power Generation Plant in Huntington Beach, Order R8-2006-0011 ("AES Permit") and the Poseidon Seawater Desalination Facility in Huntington Beach, Order No. R8-2006-0034 ("Poseidon HB"). As directed by the AES permit, by January 2008, AES must either demonstrate compliance with or set forth a plan to achieve a 95% reduction in impingement and 90% reduction in entrainment associated with the power plant. Importantly, the AES Permit contains a reopener provision that expressly provides that the permit will be reopened. The reopener provision in the AES Permit provides:

> "This Order will be reopened to address changes in State or federal statutes, plans, policies or regulations that would affect the requirements of the Order that pertain to cooling water intake."

See AES Permit § VI.C.1(f) (emphasis supplied). Similar language is further included in subsection (a) of the AES Permit, which stipulates that the permit "**will** be reopened to address any changes in State or federal plans, policies or regulations that would affect the quality requirements for the discharges." (emphasis supplied). From the quoted provisions, it is clear that the Santa Ana Regional Board contemplated the imminent adoption by the State Board of the 316(b) Policy and implementation of the federal regulations, by providing for the reopening of the AES Permit. If the AES Permit is Reopened and modified, suspended or even terminated under the forthcoming 316(b) Policy, the Poseidon HB permit will have to be reopened because the facilities operate in tandem.

On the other hand, in the case of the Permit for the Poseidon CDP and the State Board's permit for the EPS in Carlsbad, Order No. R-2006-0043 ("EPS Permit"), neither the EPS Permit nor the CDP Permit contain an automatic reopener provision that requires the permits to be reopened to accommodate the State Board's implementation of the 316(b) Policy, or in the event that a "Comprehensive Demonstration Study" or document required pursuant to the federal 316(b) regulations is completed. Instead, the Regional Board simply has the option to reopen and modify the Permit when the State Board's 316(b) Policy takes effect, or when significant changes in the quantity or character in flow occur at the EPS as a result of that facility's compliance with the 316(b) federal regulations. If the Regional Board chooses not to reopen the Permit before its expiration, or delays in doing so, this will frustrate implementation of the 316(b) Policy and the requirements of the CWA. Moreover, this will also result in similarly situated, piggy-backed power generation and desalination facilities operating in different Regions under different permit rules. This piecemeal approach to NPDES permitting is at odds with one of the central functions of the State Board—to ensure consistency in permit decisions among the Regional Boards and compliance with State Board policies and the CWA requirements.

Accordingly, the Regional Board should include language in the Reopener Provison that the Permit be automatically reopened with appropriate public comment and

participation once the Proposed State Wide Policy on CWA 316(b) Regulations takes effect. Further, the Regional Board should also strengthen the Reopener provision to ensure that the Permit will be reopened for other significant reasons, such as physical or operational changes, the publication of a Comprehensive Demonstration Study ("CDS"), or any other changes in relevant law, regulation or policy, that would have a bearing on the waste discharge requirements.[3] The imposition of a strengthened Reopener provision would provide an important safeguard to ensure consistent application of state wide policies and permits and to ensure that the severity and duration of adverse impacts to marine ecosystems will be minimized by operations of the Poseidon CDP.

Surfrider respectfully requests that the State Board reverse the Order of the Regional Board and Remand the Permit to the Regional Board to draft a new Reopener provision that incorporates a mandatory reopener provision that acknowledges the imminent implementation of the State Board's Proposed State Wide Policy on CWA 316(b) Regulations, and strengthens the Reopener Provision, by adding terms and conditions that *require* reopening when necessary to protect the health of marine ecosystems. In doing so, the State Board and the Regional Board will ensure that Poseidon's operations will protect public resources at the same time they are providing a public and private benefit, rather than providing these benefits at public expense.

B. *The RPA Fails to Adequately Analyze the CDP/EPS Discharges and to Incorporate These Analyses into WQBELs.*

Pursuant to 40 C.F.R. § 122.44(d), all effluent must be characterized by the Regional Board prior to determining the need for water quality based effluent limits (WQBELs) in the permit. Permits must include WQBELs for pollutants that are ***or may*** be discharged at levels that cause, have reasonable potential to cause, or contribute to a receiving water excursion above any state water quality standard.

In Table 8 of the Permit, WQBELs for CDP are established. For discharges emanating from CDP outfall No. 001: Total Suspended Solids (60 mg/L monthly average); pH (6.0 instantaneous Minimum an 9.0 maximum); Oil and Grease (25 mg/L avg. monthly, 40 mg/L average weekly, and 75 Mg/L instantaneous maximum); Settleable Solids (1.0 ml/L average monthly, 1.5 average weekly, and 3.0 Instantaneous max); Turbidity (75 NTU average monthly, 100 NTU average weekly, and 225 instantaneous max); and chronic toxicity (16.5 TU maximum daily).

In addition, the combined Poseidon CDP and EPS salinity limitations for effluent discharged from Monitoring Location No. 002 is 40 ppt average daily and 44 average

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[3] These standards for Re-opening a reverse osmosis desalination plant permit were recommended by the staff of the Santa Ana Regional Water Quality Control Board in response to comments received in connection with the permit issued to the AES plant located in Huntington Beach.

hourly. However, for the other constituents set forth in Table 10 of the Permit, the individual metals and priority pollutants from Table B of the Ocean Plan, the Regional Board has adopted "performance goals" based upon the Regional Board's finding of an "inconclusive" RPA. The Fact Sheet for the Permit, however, indicates that these WQBEL standards or performance goals were established using a statistical methodology that involved either projected effluent quality data provided as part of the Report of Waste Discharge, or projected effluent quality data which are estimates based upon pilot project effluent quality data provided by the discharger. *See* Permit Fact Sheet, F-29-30. These statistical analyses-- based upon modeling estimates and projections using data obtained partly from the discharger-- are inadequate to establish appropriate WQBELs for the Poseidon CDP facility.

The California Ocean Plan, published by the State Water Resources Quality Control Board, sets out the appropriate procedure for conducting an RPA when there is a lack of site specific data. According to that document, if facility-specific effluent monitoring data is not available (as is the case here), step 13 must be used. Step 13 requires a review of all available information to determine if WQBELs exist, including the ***discharge type***, solids loading analysis, ***facility type***, history of compliance problems, potential toxic impact of discharge, fish tissue residue data, water quality and beneficial uses of the receiving water, CWA 303(d) listing for the pollutant, the presence of endangered or threatened species or critical habitat, and other information. This analysis should also include consideration of the impacts on the EPS' cooling water flows caused by changes in flow quantity or character brought about by compliance with the forthcoming 316(b) Policy and existing CWA regulations, or in the event that the Poseidon CDP operates as a stand alone facility (see comments in II.C, below).

A wealth of data is available in the desalination literature that has not been included in the RPA. For instance, data on the ***discharge type*** is available and has not been adequately considered. These impacts should be carefully analyzed as part of the RPA. The article "Ecotoxicological marine impacts from seawater desalination plants", published in Desalination Journal, highlights several potential impacts which are not adequately considered. A few of these impacts are as follows:

(1) ***Thermal loading***. Thermal loading was found to bring about the following adverse effects: depression in the rate of phytoplankton photosynthesis; replacement of normal algae populations by less desirable species; the decrease in the production of macroalgal populations; and a decrease the abundance and diversity of phytoplankton.

(2) ***Increased salinity***: increase in the salt concentration can reduce plankton production to extinction (mainly of larvae and young individuals). The susceptibility of invertebrates, mainly crustaceans, varies, but in general, those with a long stomach are more sensitive to a rise in salinity than those with a short one. Crustacean and other invertebrate larvae floating in the water column are also more sensitive to variations in

salinity levels than fully developed individuals. Some of the species, mainly the diatoms, are resistant to high salinity levels, but most of the species will not survive.

(3) ***Copper (Cu)***: Concentrations of copper found in desalination effluents are 200 fold higher than natural copper concentrations in sea water; moreover, at elevated levels, Cu is very toxic, it acts as enzyme inhibitor in organism and can result in the demise of large numbers of susceptible organisms. For phytoplankton, Cu inhibits photosynthesis, restrict the uptake and assimilation of nitrate and the uptake of silicate.

In addition, data on the ***facility type*** is available. Thus, the RPA should analyze data from similar facilities, rather than simple calculating WQBELs from statistical analyses based upon estimates generated by samples or by the discharger. According to the article "Concentrate and other waste disposals from SWRO plants: characterization and reduction of their environmental impact", published in Desalination Journal, effluents from Salt Water Reverse Osmosis (SWRO) plants (such as CDP), result from reverse osmosis lines, which discharge concentrate, rinsing water characterized by a high content in dissolved salts (generally from 1.7 to 2.5 times that of the seawater content) and by an acid pH (pH about 5.50 vs. a seawater pH close to 8.00). The SWRO membrane cleaning units also utilize dirty chemical solutions, which are characterized by a pH that may be very alkaline (pH 11) or very acid (pH 3) and can cause strong loads in biological, mineral and organic matters.

Further, the journal article "Chemical impacts from seawater desalination plants - a case study of the northern Red Sea" discussed the effects of conventional discharge methods similar to those proposed in Poseidon's permit and found that the overall daily chlorine discharge within the study area amounted to 2,708 kg. More optimistically, the article "Brine Discharge from the Javea Desalination Plant", published in Desalination Journal, discusses a reverse osmosis facility with a decreased marine impact: The Javea desalination plant, on the Mediterranean coast of Spain. This SWRO plant currently has a production capacity of 28,000 m3/d of desalinated water. The brine discharge of this plant, conveniently diluted in the Fontana Canal, creates an artificial movement of the waters in the Canal, and brings the density and the temperature of the canal water more in line with that of sea water. It also reduces the effects of the sun in summer and oxygenizes the beds of the canal.

These journal articles provide an example of the wealth of data available concerning discharges and facilities comparable to the CDP, yet these data and studies were not considered in the RPA that gave rise to the WQBELs set forth in the CDP Permit.

C. The Undiluted Direct Discharges from a Stand-Alone Facility Have not Been Adequately Analyzed and Will Have Significant Adverse Marine Impacts

As commented in Surfrider's letter to the Regional Board on August 9, 2006 (Exhbit B), the EPS in Carlsbad has been decreasing capacity and currently ceases operations for as many as 100 days per year. The Poseidon CDP will therefore be operating as a stand-alone facility up to 27% of the time. Moreover, Cabrillo Power I LLC, the owner of the EPS, announced its intention in July 2006 to dismantle and reconfigure the existing ESP facility within the next few years. *See, e.g.*, Michael Burge, *Upgrade May Produce 340 Megawatts of Irony*, San Diego Union-Tribune, July 26, 2006. Although subsequent statements by the company rendered some uncertainty about the likely shut-down date for the antiquated plant, *see* Michael Burge, *Water board Oks High-salt discharge permit*, San Diego Union-Tribune, Aug. 17, 2006, the Regional Board had an obligation, in exercising its best professional judgment, to investigate this issue further and potentially adjust the terms of the Poseidon CDP permit to accommodate it.

In the event EPS shuts down--or is idle for substantial periods of time-- the Poseidon CDP will then be operating as a stand alone facility. Again, the literature suggests that discharges from a stand-alone reverse osmosis plant can have significant adverse impacts on marine ecosystems. According to the article "The footprint of the desalination processes on the environment", published in Desalination Journal, the direct discharge method (the method for a stand-alone plant) is not recommended for seas with high sensitivity, or for large desalination plants. Even if the brines would be mostly diluted at a short distance from the outlet, during the many days in which the sea is calm, the secondary dilution would be negligible. On those days the damage to the coastal habitats would be high.

In addition, according to the article "Ecotoxicological marine impacts from seawater desalination plants", published in Desalination Journal, some chemical components released by desalination plants pose a potential hazard to estuarine organisms owing to their toxicity. Most important in this respect are chlorine and trace metal loads which must receive much attention because at times it accounts for much of the mortality of susceptible organisms in discharge waters, leaving their mark on the flora and fauna around the pipeline outlet. Taken together, thorough consideration of the marine impacts of operating the CDP as a stand-alone facility must be included in the permit. Moreover, as part of the Regional Board's obligation to exercise best professional judgment, thorough consideration of the impacts on the Poseidon CDP resulting from EPS' compliance with the federal 316(b) regulations must be undertaken and reflected in the permit. Because the Permit has not adequately considered CDPs operations as a stand-alone facility and in tandem with the EPS, the Permit is inadequate.

III. Conclusion

The Regional Board acted unlawfully in failing to perform a complete Reasonable Potential Analysis when establishing WQBELs in the CDP Permit. The Regional Board also failed to adequately consider Poseidon CDP's operations as a stand alone facility,

and to provide any provisions for an automatic or mandatory reopening the Permit to minimize harm to public resources or otherwise comply with the State Board's forthcoming State Wide Policy on CWA 316(b) Regulations or other significant changes in state or federal law. The State Board should therefore reverse the Regional Board's Permit decision and remand the Permit to the Regional Board with instructions to substantially revise the Reopener Provision, perform a complete RPA and promulgate appropriate WQBELs, and make any other appropriate changes after thorough consideration of the impacts of the CDP's operations as a stand-alone facility.

Dated: September ___, 2006

Respectfully submitted,

By:_____
Martin McCarthy
Daniel Cooper
Lawyers for Clean Water, Inc.
Attorneys for Surfrider Foundation
and Orange County Coastkeeper

cc: A true and correct copy hereof has been mailed on September 15, 2006 as follows:

John Robertus, Executive Officer
California Regional Water Quality Control Board,
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, California 92123
FAX: (858) 571-6972
(Permit attachment omitted)

Peter M. MacLaggan
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Cabrillo Power I LLC
4600 Carlsbad Blvd.
Carlsbad, CA 92008-4301
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May 18, 2006

Mr. Larry Purcell
San Diego County Water Authority
4677 Overland Avenue
San Diego, CA, 92123

Re: Regional Seawater Desalination Project at Encina Power Station draft Environmental Impact Report

Dear Mr. Purcell,

The Planning and Conservation League submits the following comments on the San Diego County Water Authority's Regional Seawater Desalination Project at Encina Power Station draft Environmental Impact Report (DEIR). We appreciate this opportunity to comment on this project and request careful consideration of these comments and those received by other individuals.

Large scale desalination has not yet been successfully achieved in California or in the United States. There is only one large scale seawater desalination facility in the United States. That facility, located in Tampa Bay Florida, cost millions of dollars but has never functioned as intended and has cost considerably more than originally expected. Citizen uproar over these unexpected costs has called into question continued operation of the facility.

The proposed project under this DEIR would be the first large scale reverse osmosis facility in California, the largest in the United States, with a projected capacity of twice Tampa Bay's poorly-functioning facility. Careful and thoughtful consideration must be given to this project proposed for the County of San Diego to ensure that all concerns and outstanding issues raised by citizens and ratepayers are addressed prior to moving forward with such a large-scale facility that will have enduring impacts on the Northern San Diego County community and on the coastal and marine resources of Southern California.

As the **eight** comments below demonstrate, this DEIR does not provide information essential to assessing the long term feasibility and impacts of the proposed project. Specifically, the DEIR does not adequately demonstrate a need for the project. It fails to adequately analyze alternatives. It fails to analyze the operation of the desalination plant separately from the power plant operations. It does not provide information on the impacts of energy use or analyze how the facility's operations would perpetuate climate change. It fails to adequately analyze growth inducing impacts, environmental justice impacts, impacts on marine life, the healthfulness of the produced water or the cumulative impacts of the proposed project. All of this information is essential for the public and the city council to consider prior to moving forward on this project.

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This project will impact future Clean Water Act compliance, coastal zone management, land use planning, electricity generation, and the marine ecosystem of the Southern California Bight. Such a decision requires thorough information and careful consideration of the full impacts and alternatives available.

Unfortunately, this DEIR is inadequate, flawed, and sets an unacceptably low precedent for future reviews of desalination in California. The DEIR does not provide essential information to the decision makers of San Diego County and to residents of San Diego County. These communities deserve an adequate EIR.

We strongly urge the County of San Diego to reject the current DEIR and attain and make available to the public all information essential to making an informed decision prior to moving forward with any proposed seawater desalination project in San Diego County.

Thank you,

Matt Vander Sluis
Planning and Conservation League

Cc: City of Carlsbad Planning Department, Huntington Beach City Council, City of Oceanside Planning Department, City of Vista Planning Department, John Clay, Joe Geever, Conner Everts, Coastal Commission: Tom Luster, Peter Douglas, Al Wanger.

COMMENTS

1) The DEIR does not adequately demonstrate a need for the proposed project.

The DEIR states that "the proposed Project is intended to assist the Water Authority in providing a diversified water supply portfolio to accommodate the existing population and expected regional growth, while also planning for times when water availability is scarce due to variations in hydrology and increased stakeholder competition for limited imported water supplies (2.0-1)."

This implies that in general, water produced by this facility would *add* to the water supply, only occasionally *replacing* existing supplies. However, State of California documents show that supplemental water is unnecessary in Southern California.

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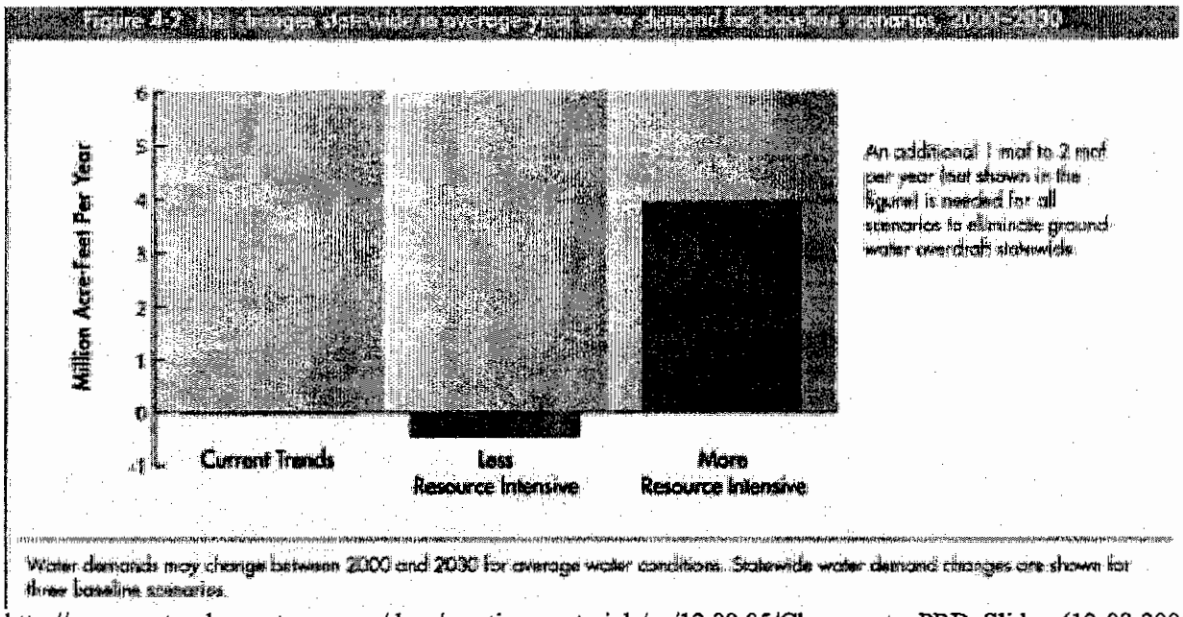
The recently released *California Water Plan Update2005* shows that under the "current trends" scenario water demands across the state decrease slightly by 2030, even with an additional twelve million residents (see figure 4-2 below).



http://www.waterplan.water.ca.gov/docs/meeting_materials/ac/12.09.05/Changes_to_PRD_Slides_(12-08-2005).pdf

The *California Water Plan Update* also indicates that the Southern California region could feasibly use less water in 2030 than it does today.[1] The *Update's* less-resource intensive scenario (see below) indicates that Southern California will use about 100,000 acre-feet less water with minimal implementation of conservation measures.[2]

[1] California Water Plan Update, Highlights, page 4
[2] California Water Plan Update, Highlights, page 4.

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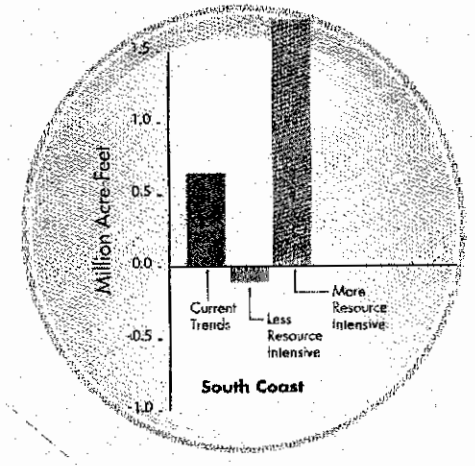

California Water Plan Update, Highlights, page 4

In addition, the recent Pacific Institute report, *California Water 2030: An Efficient Future* determined that it is feasible for total water use in California to decrease by as much as 20 percent by 2030.

Accordingly, the DEIR should provide documented information that explains the need for an additional 56,000 acre-feet per year in San Diego County. Without such information, there is no demonstrated need for this project.

The required explanation of additional need must be detailed and rigorous and must rely on more than a presumption of regional population growth. As the *California Water Plan Update* states, "As has been demonstrated in various regions of the state, an increase in population does not necessarily result in a proportionate increase in urban water use." San Diego provides a strong example; In their February 2005 *SDCWA Water Conservation Fact Sheet* the San Diego County Water Authority reported that "water conservation measures are expected to reduce total urban water demands by approximately 10 percent in 2020, with an estimated savings of 93,200 acre-feet of water a year." They also state, "Urban per capita water use is actually lower than it was in 1990."[3] The DEIR must analyze this document and show what regional changes will create the demand for an additional 56,000 acre-feet annually beyond the supplies that will be available from future water conservation and recycling. In describing these regional changes, the DEIR must also show why less resource intensive scenarios such as those discussed below would not be feasible.

[3] http://www.sdcwa.org/manage/pdf/Conservation/Conservation_factsheet.pdf

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2) The DEIR does not fully analyze alternatives to the proposed project.

The DEIR fails to analyze alternatives other than desalination that could fulfill the stated aim of "(allowing) for the production of a locally controlled, cost-effective and safe, high-quality water supply, less affected by natural disasters..." In particular, the DEIR fails to analyze an alternative that includes conservation, recycling and groundwater treatment.

In 2004, Water for California and the Planning & Conservation League released an analysis of cost-effective strategies to meet California's future water needs. The document, the *Investment Strategy for California Water* (*Investment Strategy*) demonstrated that California can more than meet water needs with implementation of cost-effective water conservation, water recycling and groundwater clean up. The chart from the *Investment Strategy* below summarizes these findings.[4]

Additional Needs	million acre-feet
Population Increase	2.0-2.4
Environmental Restoration	1.0
Total additional needs	**3.0-3.4**
First Priority Options	**million acre-feet**
Urban Water Conservation	2.0-2.3
Agricultural Water Conservation	At least 0.3-0.6
Recycled Water	1.5
Groundwater Treatment and Desalination	At least 0.29
Total First Priority Potential	**At least 4.09-4.69**

In addition to the *Investment Strategy*, the *Water California Plan Update, State Recycled Water Taskforce Findings,* and the Pacific Institute's *California Water 2030: An Efficient Future* all indicate that water conservation, recycling and groundwater management can more than meet water needs in California. As stated above, the *California Water Plan Update* indicates that California and in particular Southern California could feasibly use less water in 2030 than is used today.[5] In the scenario that California needs more water, the *California Water Plan Update* identifies several options that are more reliable and cost-effective than large scale seawater desalination, including water conservation and water recycling.

[4] *Investment Strategy for California Water*, page 2. http://www.pcl.org/pcl/pcl_files/Investment%20Strategy_11_18_04.pdf
[5] California Water Plan Update, Highlights, page 4.

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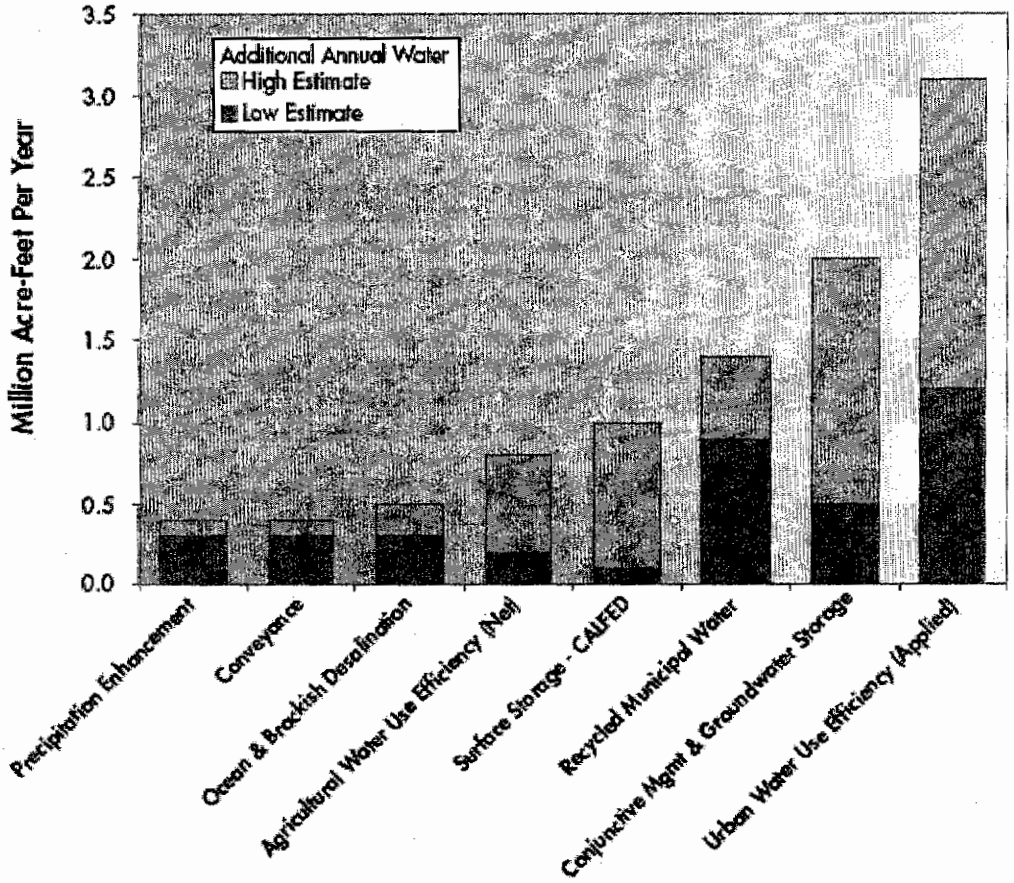
According to the *California Water Plan Update*, Urban Water Use Efficiency holds the greatest potential as a water management option with a potential to provide up to 3.1 million acre feet of water. The Update states that recycled water has a potential to provide up to an additional 1.4 million acre feet of water. Groundwater management and storage is also identified as having a significant potential at greater than 2.0 million acre feet.[6]



California Water Plan Update, Highlights, page 14

The recently released *California Bay Delta Authority Water Use Efficiency Comprehensive Evaluation Public Review Draft April 2006* evaluated water use efficiency potential in California and found that statewide, there is 3.1 million acre feet of existing potential. The Comprehensive Evaluation further identified 330 thousand acre feet of cost effective water conservation potential that could be achieved in the South Coast region by 2010, and over 500 thousand acre feet of potential savings that could be achieved by 2020 (p. 120, figure 3.13). This implies that by 2010, cost-effective water use efficiency could provide over six times the water that is proposed to be produced by the desalination facility.

[6] California Water Plan Update, Highlights, page 15

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Despite these remarkable water management possibilities, the DEIR specifically declines to analyze increased water conservation and recycled water.

In justifying the absence of an alternative that explores water conservation, the DEIR claims that increased water conservation above the 94,174 acre-feet called for in the 2005 UWMP would require "non-cost-effective/unproven BMP's and enforce restrictions that could harm the region's economy and result in a drastic change in lifestyle" (7.0-5).

It is widely understood that the Best Management Practices (BMPs) agreed to over a decade ago as part of the Memorandum of Understanding in the formation of the Urban Water Conservation Council represent minimum water conservation actions and minimum potential savings and do not intended to achieve implementation of all cost-effective conservation. For example, the BMPs do not include any outdoor water conservation measures as described in the findings of the State Landscape Taskforce.

Since the time of the MOU, new methods for achieving greater water savings have been identified. For instance, AB 1881 (Laird) sponsored by the San Diego County Water Agency would direct water agencies to implement outdoor conservation beyond the current implementation required by the BMPs. Other pending legislation, including AB 2515 (Ruskin) and AB 2496 (Laird) would seek to implement feasible and cost-effective water conservation programs that water agencies, including San Diego County Water Authority have not yet implemented.

Numerous examples across San Diego and the U.S. demonstrate that cost-effective water conservation, such as landscape water conservation and more water-efficient appliances, does not represent a drastic change in lifestyle.

In justifying the absence of an alternative that explores recycled water, the DEIR claims that "for recycled water, the primary obstacles are market acceptance, distribution costs, water quality, and regulatory issues…Due to the obstacles described above and considering that the Water Authority's Urban Water Management Plan already includes recycling, conservation, and groundwater, this alternative is not considered feasible" (7.0-5).

All of the policy obstacles described above exist for both recycled water and desalination. By this logic, the absence of any large scale ocean water desalination facilities in California compared to the hundreds of successful recycled water projects currently in operation should be a clear indication that recycled water is a popular, feasible mechanism to increase the overall availability of water including making available more water for drinking by providing a source for non-potable needs. This option should be pursued to the maximum extent possible. Clearly, the implementation hurdles identified in the DEIR should not be used to preclude inclusion of this alternative. While they may influence final decision making, they should not influence the decision to determine feasibility for inclusion in an Environmental Impact Report.

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By failing to analyze an alternative that includes the finding of the *California Water Plan Update,* the *Investment Strategy for California Water,* the Pacific Institute's *California Water 2030: An Efficient Future, the State Recycled Water Taskforce Findings, the Landscape Taskforce Findings*, or the *California Bay Delta Authority Water Use Efficiency Comprehensive Evaluation Public Review Draft April 2006* and instead simply analyzing one of the array of options discussed in the Master Plan EIR, this DEIR falsely indicates that Southern California and in particular San Diego County has no alternative to achieve their stated aims without this particular expensive seawater desalination plant.

In fact, as outlined in the above documents, other alternatives could more than meet the DEIR's stated aims in a more reliable, less energy intensive, more cost-effective and less environmentally damaging way than the proposed project.

These alternatives are especially appropriate given the stated interest in a drought-proof water supply.

Unlike seawater desalination, conservation, water recycling and use of stored groundwater are proven, reliable drought responses. Recent developments of these water management strategies have increased drought reliability in Southern California. For example, in Orange County, recycled water is being stored in natural local aquifers, providing a secure supply that can be accessed during drought periods. A more reliable local source of potable water for the San Diego region could be attained through a program similar to the one in Orange County.

For the past many years, Southern California has maintained its water supply reliability without increases in water supply. The region met water demands during the 1996-1997 drought. It met demands during the current long-term drought in the Colorado River system. It met demands during the past four years which were some of the driest years in Southern California. Over these dry periods, water needs have been met with minimal conservation and reclamation efforts.

Alternatively, large-scale seawater desalination has not proven to be a reliable drought supply. In times of drought, hydroelectricity throughout California and the Pacific Northwest is reduced and prices of remaining electricity increase. According to a recent California Energy Commission report, energy is less available precisely when local water needs are greatest.[7] The proposed desalination facility would be a significant strain on the energy grid, requiring more energy than any other source of water. The DEIR fails to address how energy shortages and increased cost will affect the reliability of the proposed project. Therefore, the DEIR does not provide sufficient support for the conclusion that the proposed project would in fact increase water supply reliability in San Diego County.

[7] California Energy Commission Potential Changes in Hydropower Production from Global Climate Change in California and the Western United States - Consultant Report, CEC publication # CEC-700-2005-010 http://www.energy.ca.gov/2005_energypolicy/documents/index.html#062105

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These alternatives should also be analyzed in the DEIR in keeping with the recommendations of Governor Schwarzenegger's Climate Action Team.

The December 2005 draft *Climate Action Team Report to the Governor and Legislature* outlines the potential energy and air emissions benefits of water conservation, especially in Southern California:

> Region, elevation, water use sector, and energy source, among other factors, all influence water energy intensity. The statewide average for climate change emissions per acre foot is skewed by the wide local variation in the water energy intensity. Everything else being equal, a cooling tower condition meter installed in an industrial plant in Northern California will save 2,920 kWh compared to 9,270 kWh saved annually in a comparable plant south of the Tehachapi Mountains.
>
> Increased water use efficiency is the key element in the California Water Plan Update (Bulletin 160-05) plans to meet the state's needs for water in 2030 with a growing population. The plan calls for reducing urban water use by 1.1 to 2.3 MAF per year and agricultural water use by 0.5 to 2.0 MAF per year by 2030.
>
> Accelerating the investment to attain that water use savings by 2015 would result in an estimated additional climate change emission reductions of approximately 30 million tons cumulatively by 2030. Accelerating the investment to 2010 would result in a further cumulative reduction of 10 million tons. (p.63)

http://www.climatechange.ca.gov/climate_action_team/reports/2005-12-08_DRAFT_CAT_REPORT_TO_GOV+LEG.PDF

The DEIR should be re-drafted to include an alternative based on the *California Water Plan Update,* the *Investment Strategy for California Water,* the Pacific Institute's *California Water 2030: An Efficient Future, .the State Recycled Water Taskforce Findings, and the Landscape Taskforce Findings*, so that a full comparison of alternatives can be considered by the County of San Diego and elected officials.

3) By failing to analyze the proposed large-scale desalination facility apart from the Power Station, the DEIR fails to analyze the full environmental impacts of the desalination facility, especially impingement and entrapment of marine life.

The DEIR states that because the proposed desalination facility will be co-located with the Encina Power Station (EPS) and will make use of an existing once-through cooling intake, the project has no significant impacts on the marine life from impingement and entrainment. This finding is misleading, untrue and inconsistent with the recommendations of the State of California.

The California Department of Water Resources convened a Desalination Task Force and published the

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Task Force Findings and Recommendations in October of 2003.

According to the *Desalination Task Force Findings*, co-locating a desalination facility with a coastal power plant, as is proposed with the DEIR, can provide a justification for the continued use of once-through cooling technology. Once-through cooling technology has well-documented environmental impacts, including impacts on marine organisms from impingement and entrainment, according to the Desalination Task Force.[8]

In order to ensure all impacts from a desalination facility are understood, the Desalination Task Force recommended that impacts from a proposed project be assessed separately from the existing power plant.[9] The DEIR fails to follow this state recommendation.

Assessing impacts of the desalination facility apart from the power plant is important because power plants may be shut down or the operation of the power plant may change in a way that is incompatible with desalination operations. In those cases, the desalination facility would need to function separately from the existing facility, and therefore the impacts of the desalination operation would be different that the impacts from the existing facility.

Older power plants such as the EPS use open ocean intakes to gather water for once-through cooling. This method of cooling requires vast amounts of water and the unscreened intake results in very high marine life loss. Numerous species of marine life in the Southern California Bight are currently under extreme pressure and several are estimated to have been depleted to less than ten percent of their historical populations.

However, there are new technologies for power plants that re-circulate cooling water or use dry methods of cooling which significantly reduce the water needed for power generation, which in turn reduces the impacts on the marine environment.

Of note, in May 2006, the Contra Costa Water District (CCWD) released the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for CCWD's Alternative Intake Project for public review and comment. The Draft EIR/EIS evaluates the proposed construction and operation of a new non-open-water intake for CCWD.

Under the Federal Clean Water Act, a power plant must have a current 316 (b) permit for an intake to the ocean. The Federal EPA recently adopted new rules for permitting ocean water intakes. The new rule requires all large existing power plants, including EPS, to reduce impingement and entrainment of marine life by the cooling water intake structure by 80 to 95 percent. In addition, the law requires cooling intakes to utilize the best available technology for reducing entrainment and impingement.

[8] Water Desalination Task Force, October 2003. Department of Water Resources, page 5.
[9] Water Desalination Task Force, October 2003. Department of Water Resources, page 21.

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There is a process underway to update the 316 (b) permit for most power plants in California. The current intake for the EPS does not reflect the best available technology for reducing impacts, as required by the new rules. It is uncertain how the EPS intends to comply with the recently promulgated Clean Water Act 316 (b) regulations on cooling water intakes. One potential compliance response would be to reduce the volume of intake water from the historical baseline.

This course of action would make the proposed desalination project infeasible because the desalination facility would require a vast amount of water to produce potable water as well as to dilute the brine wastewater produced by the desalination process. In this case, the operation of the desalination facility would be significantly different that the operation of the intake for the power plant. Failing to assess the impacts of the intake on marine life separate from the impacts of the power plant is a significant flaw in the DEIR. The DEIR must state if the EPS has updated its 316 (b) permit and if not, how it plans to achieve compliance. Without this information the DEIR is inadequate.

In avoiding the issue of 316(b) compliance the DEIR also fails to mention the State Lands Commission resolution adopted on April 17, 2006 which states that the Commission "shall not approve new leases for power facilities, whose operations include once-through cooling unless the power plant is in full compliance, or engaged in an agency-directed process to achieve full compliance, with requirements imposed to implement both Clean Water Act Section 316(b)."

In their resolution the Commission acknowledges the co-location issue, stating, "it is premature to approve new leases or extensions, amendments or modifications of existing leases to include co-located desalination facilities or other uses of once-through cooling water systems until first considering whether the desalination facility would adversely affect compliance by the power plant with requirements imposed to implement both the federal Clean Water Act Section 316(b) requirements and any additional requirements imposed by the State Water Resources Control Board and appropriate Regional Water Quality Control Board under state law and their delegated Clean Water Act authority.

The Ocean Protection Council passed a similar resolution in April 2006.

The DEIR must explain how the project will comply with the State Lands Commission resolution and the Ocean Protection Council resolution, as well as the general body of scientific evidence detailing the harmful effects of Once-through Cooling on marine ecosystems.

In addition, the DEIR does not indicate how the project will affect areas designated as Area of Special Biological Significance by the State Water Resources Control Board.

Because the DEIR does not adequately assess the environmental impacts of entrainment and entrapment at the proposed desalination facility, the DEIR is fatally flawed and must be rejected.

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4) The DEIR does not provide clear information about the project's use of energy. Specifically it fails to clearly explain the amount of energy required for this project, the source of that energy, how that energy production affects overall project costs, the affects of global climate change on energy availability, the impact of the project's energy consumption on global climate change, and the impact of the project's energy consumption on air quality.

Amount:
The proposed project would require a significant amount of energy to operate. The DEIR states that this amount would be "43.5 megawatts (MW) of electricity per day" (3.0-28). The DEIR should describe the amount of energy to be used in megawatt hours and should provide a reasonable explanation for this number.

If one assumes that the DEIR meant to say "megawatt hours," this raises serious concerns, as the amount of energy stated is vastly smaller than that of other similarly sized proposed desalination facilities.

The 2005 Huntington Beach Desalination Plant REIR for a similarly sized 50 MDG facility stated that the operation of the proposed project would require 720 to 840 megawatt hours per day, enough for 30,000 to 35,000 residential units.

The DEIR for a desalination plant at Encina Power Station proposed by the city of Carlsbad stated "the pumping of State Water Project water now requires approximately 3.200 MWh of electricity per acre foot of water, versus 4.655 (on average) to 5.123 (at maximum load) MWh of electricity per acre foot of water for the production of desalinated water at desalination plant."

If producing one acre foot of desalinated water does require 4.655 MWh on average as stated in the Carlsbad DEIR, then the 50 MGD (153 acre feet/day) that the County of San Diego proposes to provide would require 714 MWh per day.

The failure to clearly state the megawatts needed for this energy-intensive process requires that the DEIR be rejected.

Source and Impacts:
The DEIR also fails to identify the source energy for the project, stating "electrical power for the proposed desalination plant would be derived from the regional power grid or directly from the EPS" (3.0-28). This makes it impossible to adequately analyze the related impacts. The energy source for this project is important because it will affect the cost of this project and the impact of the project on the availability of energy in the San Diego County area and in the greater energy grid. It will also determine the affect of and the project's contribution to global climate change. Lastly, identifying the energy source allows a rigorous analysis of the air quality impacts of this project. Without a clearly identified energy source, this DEIR should be rejected.

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Costs:
Failure to identify an energy source obfuscates the operating price of the facility, essential information for the County of San Diego and the larger community as they weigh various strategies for achieving cost-effective water supply reliability. The greatest expense in the operation of reverse osmosis facilities is energy. The cost of operation and the economic feasibility of this project will be based on the cost of energy. If there is no secure source of energy for this project, the cost of the project operation will increase according to the market rate for energy. Increased energy costs could result in much higher operations cost, which would then increase the cost of water. The claimed benefits of this project would be greatly reduced if the price of water from the facility became prohibitively expensive, as has been the case with Tampa Bay's desalination facility.

If the energy for the project will come from the energy grid, a discussion of the impact on energy costs and energy availability must be included in the DEIR and made available to the community in order for the impacts on San Diego County , as well as the cumulative impacts in California, to be fully understood prior to a decision on this project.

Climate Change:
Global climate change is occurring in California today. We must have a frank and open discussion about how it is shaping our lives and how we are directly contributing to the problem. An Environmental Impact Report is the most appropriate forum for a discussion of the affects of a project on climate change and the affects of climate change on a project. This perspective is shared by the Attorney General of California.

On March 30, 2006 the office of the Attorney General of California submitted extensive comments calling for the analysis of the impacts of a Long-Range Transportation Plan on climate change. The comments submitted by the office of the Attorney General in response to the Orange County Transportation Authority Long-Range Transportation Plan Draft Program Environmental Impact Report should be analyzed and included in the DEIR.

Affects of Global Climate Change on Project:
It is now recognized that climate change is affecting California's water supply and that these changes will impact hydropower energy production. In June 2005, the California Energy Commission released a report entitled, *Potential Changes in Hydropower Production from Global Climate Change in California and the Western United States.*[10] The report confirms that in dry periods, hydropower production capacity will decrease.

[10]California Energy Commission Potential Changes in Hydropower Production from Global Climate Change in California and the Western United States - Consultant Report, CEC publication # CEC-700-2005-010 http://www.energy.ca.gov/2005_energypolicy/documents/index.html#062105

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The *California Water Plan Update 2005* also acknowledges that climate change will affect the way water can be managed:

> "Managing water resources with climate change could prove different than managing for historical climate variability because climate change could produce hydrologic conditions, variability, and extremes that are different from what current water systems were designed to manage; may occur too rapidly to allow sufficient time and information to permit managers to respond appropriately; and may require special efforts or plans to protect against surprises or uncertainties." (Page 4-32)

The DEIR must include an analysis of the California Energy Commission's report and analyze the implications of the *California Water Plan Update*'s predictions regarding water management under climate change, specifically addressing how climate change will affect the energy sources for the RSDP desalination facility and therefore the reliability and cost of water supplied by the RSDP.

Also, most climate change models predict an increase in sea level. Some models predict these changes to be on the magnitude of tens of feet. This calls into question the viability of the physical/structural components of this proposal. The DEIR must describe what reasonably foreseeable actions might be carried out to ensure that the facility functions properly under these new conditions and what environmental impacts may be expected from those actions.

Project Impacts on Global Climate Change:
The DEIR must also analyze the impacts of the project's power demand on the energy grid for California and the Pacific Northwest and how the increased energy demand will contribute to global climate change.

The instructions for the US Department of Energy's Voluntary Greenhouse Gas Reporting program (http://www.eia.doe.gov/pub/oiaf/1605/cdrom/pdf/FormEIA-1605_2005_Instructions.pdf) state that the carbon intensity of the California electric grid is 0.275 metric tons of CO2 per MWh.

According to the EPA's calculations, the generation of 714 MWh per day to power the desalination facility would generate 196.35 metric tons of CO2 per day. The generation of 43.5 megawatts (MWh) per day would generate 11.9625 metric tons of CO2 per day.

For reference, an average new car driven an average amount is estimated to produce approximately 12,000 lbs (5.44 tons) of CO2 per year.

That means that the generation of 714 MWh per day to power the Regional Seawater Desalination Project at Encina Power Station would release as much greenhouse house gases as the addition of 13,174 new cars in Southern California each year.

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Unfortunately, by failing to address climate change the DEIR avoids the opportunity to move beyond a fundamentally flawed and outdated assumption; that environmental conditions in California have been static and will continue to be static in the future. This is not true and therefore the DEIR must be rejected.

Air Quality:
The DEIR is required to identify and mitigate for the air quality impacts of generating the energy necessary for this project. If the energy for the DEIR project will come from the Encina Power Station, the air quality impacts on residents in the region must be included in the DEIR. If the energy for the project will come from the energy grid, air quality impacts in this substantially larger area must be included in the DEIR, including impacts to areas with already degraded air quality and impacts to pubiic health with the increased risk of asthma. Given the high levels of smog-forming NOx emissions and PM10 from power plants and the clearly identified relationship between air pollution and elevated rates of childhood asthma and cancer in Southern California and throughout the state, any additional air pollution generated because of the RSDP facility must be analyzed in light of these accompanying health affects.

It should be noted the San Diego air basin is currently in non-attainment status for PM 10 and ozone.

The DEIR does not provide information necessary to adequately assess how the energy consumption of the proposed project will affect the San Diego County community and the larger West Coast region. It should therefore be rejected.

5) Growth inducing impacts have not been adequately analyzed.

The DEIR fails to identify a use or user for the project water, simply stating that that it would "accommodate the existing population and expected regional growth" (6.0-5). The absence of an identified user or identified mechanism, plan, or intention to ensure the decrease in importation of water calls into question the intended use for the project, and implies that water produced from this facility will be used to induce or facilitate new development and growth.

We therefore appreciate the honesty of the DEIR when it states that the "proposed Project could potentially remove an obstacle to growth or otherwise facilitate development by making water more available, and could therefore by definition be considered 'growth inducing.'" (6.0-8)

Unfortunately, the DEIR does not answer basic questions about the nature of those growth inducing impacts. This information is essential because growth caused by this project will have a number of effects including regional air quality, water quality, and traffic congestion, and these changes must be properly analyzed and considered.

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The extent of induced growth should be carefully considered in this DEIR. The DEIR incorrectly claims that "growth-limiting factors in San Diego County are primarily related to availability of buildable land and adequate infrastructure" (6.0-3). Water availability, as analyzed in water supply assessments such as those required under SB 221 and SB 661, is an integral component of growth regulation in San Diego County and all of southern California. In fact, three pages after claiming that water is not one of the primary growth-limiting factors, the DEIR admits that "development outside the (Water Authority's established service area) boundary is generally restricted by the limited supply of local water" (6.0-6). The public deserves to know the extent to which this new water supply would facilitate sprawl development in these and other areas.

The DEIR also claims that "imported water also has an energy demand component, and as such, replacement of imported water supplies with desalination water supplies in general would have a relatively small net effect on energy consumption" (6.0-4). According to the Department of Water Resources Desalination Task Force Findings, seawater desalination requires 30 percent more energy than any other supply source to Southern California, including imported water. As noted above, without a mechanism to ensure that water produced through seawater desalination actually reduces the importation of water, the DEIR should not understate the new facility's potential to generate large new growth in energy demands and construction of energy supply facilities.

Although it admits that the project would induce growth, the DEIR inadequately tiers from the Program EIR for the Regional Water Facilities Master Plan (RWFMP), to describe that growth, simply including a excerpt from the Water Authority's RWFMP which states, "the EIR concludes that while the RWFMP may foster additional growth indirectly by removing barriers to growth, it is too speculative to reasonably assess what physical effects on the environment may result from the RWFMP's contribution to growth."

An adequate Programmatic EIR for the RSDP would provide exactly the sort of specificity required to more fully explore the direct and indirect growth inducing impacts discussed in the RWFMP. Without this analysis the DEIR is inadequate and should be rejected.

The DEIR also fails to include any discussion of growth inducement in its analysis of cumulative impacts. A discussion of Growth Inducing Impacts is simply excluded in the executive summary text and in Table 1-1. This discussion must be included in all summaries and relevant chapters.

The residents of San Diego County deserve to know how additional water will affect growth in their area. The DEIR has failed those residents by not adequately assessing growth inducing impacts and should therefore be rejected.

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6) The DEIR fails to asses Environmental Justice Impacts from increased water costs and proliferation of the Encina Power Station operation.

As discussed above, the proposed project may provide justification for the extended operation of the Encina Power Station. In the absence of the proposed project, the EPS may close as newer, more efficient and less environmentally damaging power generation is developed. Operation of the proposed project would provide justification for the continued use of the EPS even if less environmentally damaging power becomes available. The DEIR therefore should analyze the impacts of continued power plant operation on the local community, and in particular the environmental justice impacts that result from the continued use of the EPS.

In addition, the water produced from seawater desalination is recognized as the most expensive source of water. Even with technological advances, seawater desalination still requires costly upkeep, including filter and membrane maintenance and replacement. Energy consumption for reverse osmosis processes is greater than required for other water options.

In addition, cost savings have never been realized as of yet for seawater desalination. In California, a seawater desalination plant constructed in Santa Barbara has never been used because operation of the plant is too costly. In Tampa Bay, the seawater desalination plant operation became significantly more expensive when it was discovered that filters and membranes would have to be replaced much more frequently than project proponents had indicated. The Tampa Bay plant currently operates far below capacity, primarily because operation is prohibitively expensive.

If the proposed project were to provide water to the residents of San Diego County, the expensive water could increase the cost of water throughout the county. This potential increase in price could be marginal, but even a marginal increase in cost could severely impact residents on limited incomes. Therefore, the DEIR should include an analysis of how increased water costs will impact water rates in San Diego County and how the increase will affect low income residents. This information is essential in order for the County of San Diego and residents of San Diego county to determine how this project will affect their region and communities.

This is consistent with the recommendation of the Desalination Task Force which highlight the necessity of addressing environmental justice in all aspects of planning for desalination.

> "Environmental justice considerations include the siting of desalination facilities, determining who accrues the costs and benefits of desalination and who has the opportunity to use higher quality (desalinated) water, and the possible impacts of replacing low-cost with high-cost water."[11]

[11] Desalination Task Force Findings & Recommendations October 2003. page 6

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7) The DEIR does not adequately indicate how the facility will assure the healthfulness of the product water.

There are several chemicals in seawater that are either not found in freshwater, or are found only in very low concentrations. For instance some algal toxins such as "Red Tide" are found in seawater. In addition wastewater discharges to the ocean introduce endocrine disrupters, viruses and parasites to coastal waters. Because California currently uses very little desalinated water, these constituents have not been evaluated as potential public health risks for drinking water. The DEIR fails to show how it will identify, test and filter for any currently unmonitored contaminants and is therefore inadequate and must be rejected.

8) The Cumulative Impacts of desalination on the Southern California Bight are not adequately assessed.

There are over twenty proposals for development of desalination on the California coast. The DEIR fails to adequately document the cumulative impacts on energy demand, marine life and growth inducement from the numerous desalination projects planned for the area and the state in general, including the RSDP facility. It also fails to examine several desalination facilities proposed for this region.

Each new desalination facility would require vast amounts of energy. These new energy demands would generate massive greenhouse gas production impacts on ratepayers and public health in Southern California, the Pacific Northwest and Mexico. The DEIR fails to examine these impacts.

The DEIR fails to address how the proposed desalination projects in Southern California will perpetuate the use of harmful open ocean intakes on the Southern California Bight.

Lastly, the breadth of sites included in the cumulative impacts analysis is inadequate. For example, the DEIR examines only one of the four possible sites for the border-area seawater desalination plant proposed by the San Diego County Water Authority. Alternate sites at the International Wastewater Treatment Plant in the Tijuana River Valley and two sites in Mexico are not included. In March 2005, SDCWA completed a feasibility study for this 50 MGD border-area desalination plant. The feasibility study stated that there was no immediate need for additional water in South San Diego County.[12] The DEIR must assess this feasibility study and include in its Cumulative Impacts Assessment all desalination facilities currently under consideration on the Pacific Coast.

Of special note in the example above, alternate sites located outside of U.S. jurisdiction may present water quality concerns both to product water and discharge water. These concerns deserve mention in the cumulative impact assessment.

[12] http://www.signonsandiego.com/uniontrib/20050618/news_6m18desal.html

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The DEIR also fails to asses the cumulative growth inducing impacts on Southern California and on the California coast and is therefore inadequate.

Conclusion

The residents of San Diego County and the County government of San Diego will be some of the first to examine large-scale ocean water desalination in the United States. They deserve and require an Environmental Impact Report that allows them to weigh the issues carefully, to examine how their health and environment will be affected and how their actions will affect their neighbors in the rest of the state and beyond. They have not received that document.

The failures of this DEIR are egregious and dangerous. They present the County of San Diego with a number of false choices.

- By failing to examine alternative water strategies, the DEIR does not identify the number of cost-effective, reliable and environmentally beneficial options that could be chosen as alternatives to the proposed costly environmentally-damaging seawater desalination facility.

- By failing to examine the amount of energy needed or the environmental impacts of procuring that energy, the DEIR inaccurately presents seawater desalination as a cheap, environmentally-neutral, supply of water.

- By failing to adequately address the growth inducing impacts and cumulative impacts of an additional 50 million gallons of water per day delivered to San Diego County, the DEIR misleads the residents of San Diego County into believing that this increased water supply will help them through droughts when in fact it will instead exacerbate the strain on many resources that are in short supply during droughts by facilitating inefficient development.

These failures of the DEIR exceed the conditions under which the City should undertake the traditional "Response to Comments." Instead, this DEIR must be re-circulated to address our concerns and the concerns of the numerous other individuals and organizations who have studied this document and submitted comments.

Because of the flaws identified in the eight comments above, this DEIR is legally deficient and must be rejected by the County of San Diego.

INDIVIDUALS

This letter has been sent to all members of the Coastal Commission and all staff members.

October 10, 2007

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Public Support for the Carlsbad Desalination Project

Dear Chairman Kruer and Commissioners:

We want to bring to your attention public opinion research recently conducted in San Diego by the San Diego Institute for Policy Research, LLC, ("SDI") and Competitive Edge Research and Communications, Inc. (CERC) that shows that voters overwhelmingly support bringing desalination projects to San Diego.

The public opinion survey, taken during the first week of September 2007, demonstrates that over two-thirds of San Diegans view the region's water availability situation as very or extremely serious, and 59.3% have made efforts to conserve water in the past few months.

According to the survey, "huge support exists for desalination," with 81% of San Diego's registered voters expressing support for seawater desalination. The public opinion survey tested three approaches for dealing with water shortages: seawater desalination, mandated water conservation, and wastewater recycling, and asked respondents to prioritize their preferred approach. Of the three options, seawater desalination garnered the most support (62%).

These public opinion results show that San Diego's ratepayers are acutely attuned to the need to diversify our water supply. Conservation and recycling are essential, and the region has made meaningful investments in these areas, but seawater desalination is necessary to achieve our water diversification and reliability goals.

Our nine San Diego County public water agencies – Carlsbad Municipal Water District, Valley Center Municipal Water District, Rincon del Diablo Municipal Water District, Sweetwater Authority, Rainbow Municipal Water District, Vallecitos Water District, the Santa Fe Irrigation District, Olivenhain Municipal Water District and the City of Oceanside – have entered into, or are negotiating, long-term water purchase agreements with the operator of the Carlsbad Desalination project, Poseidon Resources Corporation.

The Carlsbad Desalination Project will provide 50 million gallons per day (56,000 acre-feet annually) of fresh drinking water, enough for 300,000 San Diegans annually. The water will be locally-controlled and drought proof. The 30-year contracts signed by our public water agencies lock in the price of desalinated water, protect San Diego's ratepayers from financial risk and guarantee that the benefits of the project are shared regionally.

The public support demonstrated by this opinion survey and the numerous letters of support for the project sent to you - including recent letters from San Diego's Sacramento and Washington, D.C. delegations expressing unanimous, bipartisan support – clearly communicate the need for this project.

We continue to urge your thoughtful consideration and support for the Carlsbad Desalination Project.

Sincerely,

The Honorable Claude A. "Bud" Lewis
Mayor, City of Carlsbad

Mr. Gary Broomell
President, Valley Center Municipal Water District

Mr. R. Mitchel Beauchamp
Board Chairman, Sweetwater Authority

Mr. Robert "Bud" Irvin
President, Santa Fe Irrigation District

The Honorable Jim Wood
Mayor, City of Oceanside

Dr. Hanno E.G. Ix
President, Rincon del Diablo Municipal Water District

Ms. Susan J. Varty
President, Olivenhain Municipal Water District

Mr. Rua M. Petty
President, Rainbow Municipal Water District

Darrell W. Gentry

Mr. Darrell Gentry
President, Vallecitos Municipal Water District

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
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INDUSTRIAL ENVIRONMENTAL ASSOCIATION
Leaders of Environmental Responsibility

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OCT 17 2007
CALIFORNIA COASTAL COMMISSION

October 9, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer and Members of the Commission:

I have spoken many times in the past year on behalf of the proposed by Carlsbad Desalination Project, which is being developed through a public-private partnership between Poseidon Resources and the City of Carlsbad. I wanted to ensure that the Coastal Commission understands the magnitude of support this project has gained throughout the business community as you consider Poseidon's development permit application.

Since 1983, the Industrial Environmental Association (IEA) has promoted environmental responsibility and compliance through effective communication and interaction with our members, government, regulatory agencies, business and the community. We have over 50 corporate members in a variety of industries including manufacturing, engineering, consulting, energy, biotech and waste management. Our members endeavor to achieve a balanced relationship between environmental protection, public health and economically sustainable growth.

We believe that an affordable and reliable supply of water is imperative to the future of San Diego's industrial community, which provides jobs for thousands of San Diegans.

After reviewing the Environmental Impact Report for the Carlsbad desalination facility in 2005, my organization endorsed the project. We believe it clearly demonstrates the project's thoughtful planning to minimize impacts to the marine

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environment, especially the nearby lagoon which supports some endangered species.

I believe that this project is long overdue in San Diego as we work to find solutions to our water problems. Please approve the Carlsbad Desalination Project at your November 15, 2007 public hearing.

Sincerely,

Patti Krebs

Patti Krebs
Industrial Environmental Association

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
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Ms. Susan Young
Ms. Jessica Jones

NOTE: This letter and enclosure have been sent to all members of the Coastal Commission and staff members.

October 1, 2007

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Commissioners:

As a Carlsbad resident, I'm writing you regarding the proposed Carlsbad desalination project. I understand that the Commission will be evaluating this project in November and voting on whether or not to issue a coastal development permit. I am a strong supporter of the desalination plant and I urge you to vote in favor of granting the permit.

I have enclosed an article from the July 9, 2007 *Jerusalem Report* titled "Tapped In". This article talks about how desalination, a time-tested technology, is being used all over the world to solve water supply issues. Since Carlsbad is looking forward to using this same technology here at home I was compelled to share this article ~ with its especially relevant comparisons to California climates; with its photo of the new and operating since May, 2007, state of the art Palmahim desalination plant on the Mediterranean in Israel, which gave substance to my imagination of what our own desalination plant might look like; and with its explanations of the tested and refined (over a 20 year period) development of forward thinking technology, and its successful implementation.

I am proud that our city has taken such a proactive stance to secure water for its residents. With an unlimited supply of ocean water, the Carlsbad desalination project will provide one of the few reliable, drought-proof supplies of drinking water for our county. The partnership between Poseidon Resources and Carlsbad means that our needs will be met at no additional costs or risks to the taxpayers. With the looming imported water supply cutbacks about to hit our region, the timing for this project couldn't be better. This is government planning at its finest. (It takes a consortium to raise a water plant.)

Thank you for taking time to include the facts and the "can-do" attitude of the enclosed article in your consideration. As a Carlsbad citizen I believe the Carlsbad Desalination Project is good for Carlsbad and good for our entire region. Please approve this project.

Sincerely,

Vesta M. Rundle-Ross

Mrs. Vesta Rundle-Ross
3204 Via Tonala
Carlsbad, CA 92010

Enc. (Article: "Tapped In")

cc.
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Secretary Mike Chrisman
Director Lester Snow

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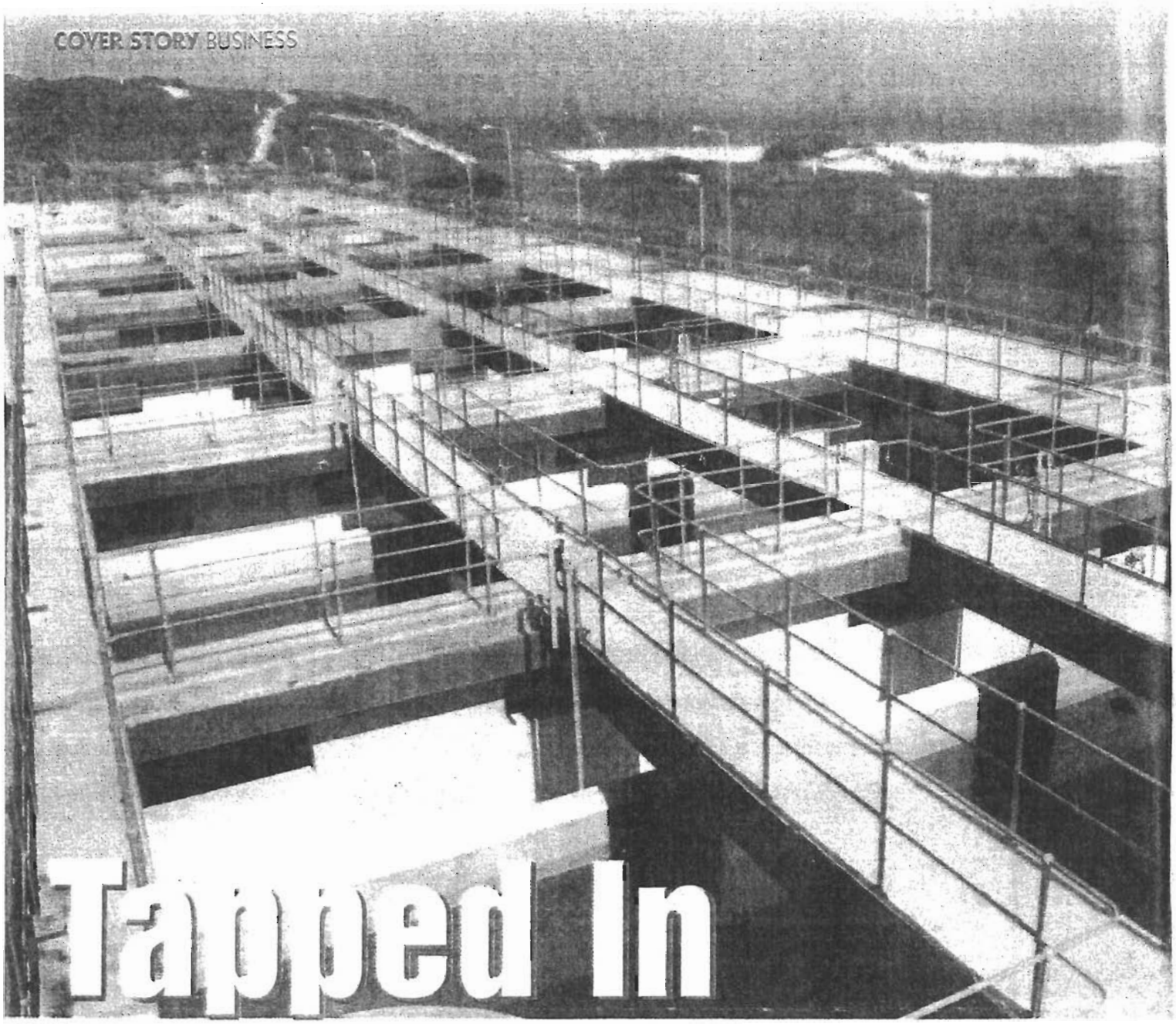


Tapped In

Eric Silver

In an increasingly thirsty world, ways of assuring more and better water supplies are being touted as the next big technology boom — with Israel in the forefront

SINCE EARLY MAY, ISraelis have been drinking water extracted from Lake Kinneret four times cleaner than the Health Ministry's increasingly stringent standards. That stimulated a television reporter covering the inauguration of a $100-million innovative filtration system at the Eshkol site near Nazareth to quip that there was no longer any need to buy bottled mineral water. Mekorot, the government water monopoly, purifies 1.7 million cubic meters a day from Israel's main surface reservoir before it is pumped into the national carrier. The plant filters the water through anthracite grit, an inert material that does not have to be renewed even after years of service. It was designed by Tahal, Israel's top environmental engineering company, and the Boston-based CDM.

Two weeks later Israel's second large-scale seawater desalination plant, seven and a half acres of shiny pipes and baths, pressure vessels and turbines, slotted discreetly between a kibbutz and a nature reserve 500 meters from the Mediterranean, began to feed 100,000 cubic meters of fresh water a day into the grid. The developers are awaiting planning permission in order to double the capacity. The cost, using state-of-the-art reverse osmosis technology, is 60 U.S. cents per cubic meter, the lowest in the world, making it economically viable. But experts say that, at double the average price of purifying and putting natural water in the same place, it's still too expensive.

The cost of the technology has decreased by 70 percent over the last 20 years. Old-

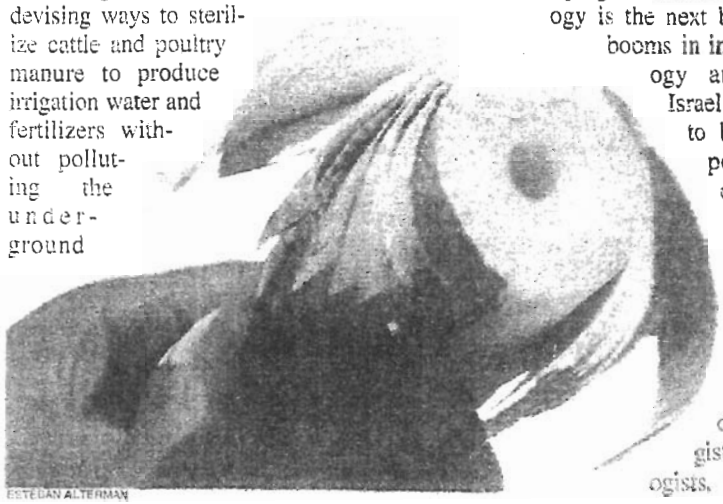
STATE OF THE ART: Seawater pools at the new Palmahim desalination plant, and, at right, a cut-away view of the filter used to remove the salt from seawater

ESTEBAN ALTERMAN

feshioned distillaton-method plants, like that built in Eilat in the 1960s, deliver at about 70 U.S. cents per cubic meter, from over $1 a few years ago. The new plant, at Palmahim between Ashdod and Ashkelon, was built by Tahal for the Via Maris consortium. Two more are planned for Ashdod in the south and Hadera between Tel Aviv and Haifa as part of a grand plan to provide Israel with 750 million cubic meters of desalinated water by 2020, enough to satisfy municipal drinking water requirements.

More exotically, Ben-Gurion University researchers recently presented prospective European partners with a sensor that could counter water terrorism by detecting chemical or bacteriological poisons introduced into the supply. Others are developing relatively cheap methods for pinpointing and repairing leaks in underground pipes, which can waste up to 40 percent of a city's total water consumption. Chicago has estimated that to repair or replace all its old pipes would cost more than the annual budget of the Pentagon. Yet others are devising ways to sterilize cattle and poultry manure to produce irrigation water and fertilizers without polluting the underground aquifers. On the domestic scale, Israeli inventors are seeking a patent on a device that will save you wasting cold water while you wait for the hot to come through the shower.

In a world haunted by climate change, population explosion, rising expectations and creeping desertification, water technology is the next big thing, after the booms in information technology and biotech. And Israel is grooming itself to be a hydro superpower. Prophecies of doom have been replaced by a new spirit of "can do, will do" in the fraternity of researchers and entrepreneurs. Hydrologists, chemists, biologists, engineers, geologists, physicists, mathe-



ESTEBAN ALTERMAN

Purest of the Pure

THE FIRST THING YOU NOTICE when you drive into the Palmahim desalination plant, amid the dunes and scrub of the Sorek nature reserve between Ashdod and Ashkelon, is how few people work there. Boaz Gazit, a senior Tahal water engineer who headed the development team, puts a premium on automation and operational efficiency. Palmahim produces its 30 million cubic meters of purified water a year with a labor force of only about 20, including maintenance, bookkeeping and monitoring staff.

Of the water taken from the Mediterranean, 47 percent is pumped through the system and into the national grid as drinking water. The remaining 53 percent is sent back to the sea as brine. Rather than squandering energy, it saves it. Since the site is 25 meters above sea level, the brine flows down. On its way back, it rotates the plant's turbines. "By this means," Gazit boasts, "we reduce energy consumption by 40 percent."

The plant was built by Via Maris, a consortium of five Israeli companies: Tahal, Granite Hacarmel, Ossif Investments, Middle East Pipe and Oceania Marine Works. The Marker business daily estimated their investment at $80 million. Via Maris is planning to build a 50 megawatt power plant on the Palmanim site to generate electricity for the desalination.

Production costs of purified water, now as low as 60 U.S. cents per cubic meter, have been cut by 70 percent over the last 20 years. There was, Gazit explains, no dramatic breakthrough but a steady technological advance.

The new Israeli desalination plants work by reverse osmosis, a separation process that uses high pressure pumps to force a solvent through a permeable membrane. It retains the solute, or dissolved substance, on one side and allows the pure liquid to pass to the other side. In this case, it filters out the salt.

A pre-treatment stage takes out fish, algae and *meduzot*, the poisonous jelly fish that plague many of Israel's beaches. The sea water is then pumped in six parallel lines through 1,300 pressure vessels, each with eight membranes, into concrete storage tanks. After that, technicians add calcium carbonate to restore the water's alkaline quality to stop it corroding the Mekorot water company's steel pipes. Too much purity can be a bad thing too.

E.S.

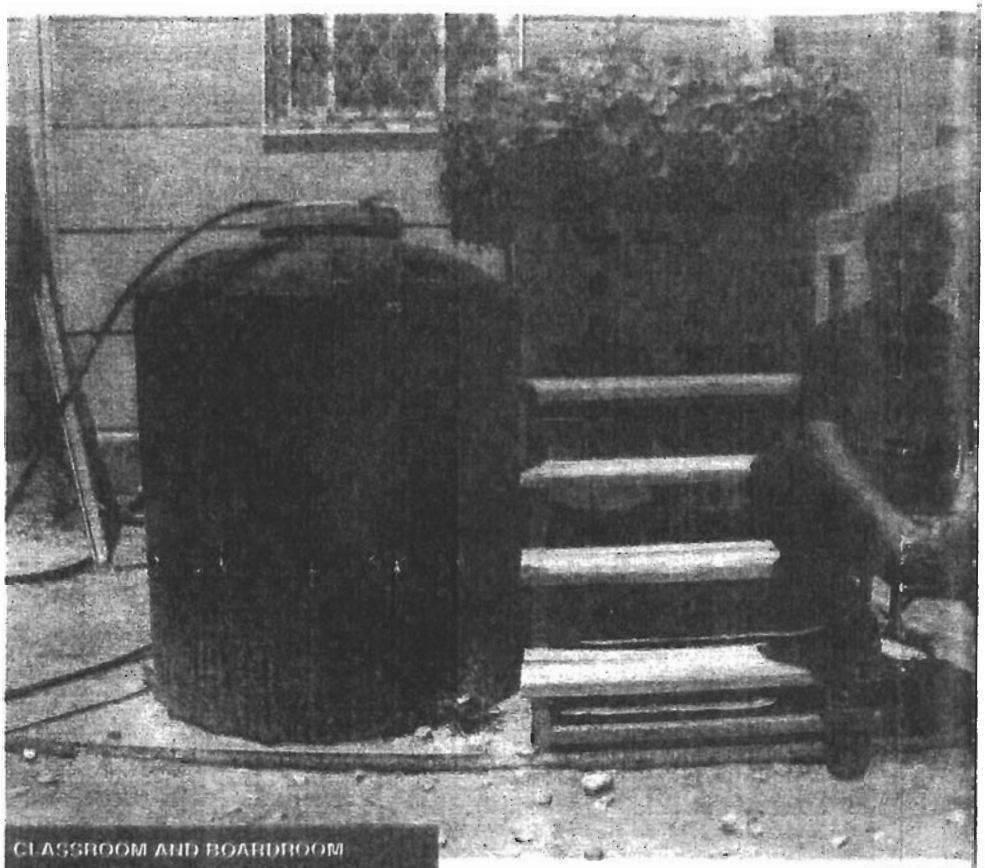
mathematicians and economists are collaborating in a multi-disciplinary endeavor to create new sources of water above and below the surface, to make the most of existing ones and to recycle sewage and effluents. The number of water technology start-ups in Israel has doubled over the past two years from about 50 to 100. It is a worldwide market currently estimated at $50+ billion, which is increasing by 6-7 percent a year.

The government this year allocated 160 million shekels ($40 million) as a first step in a strategic program to foster the water industry. It is expected to invest another 200 million shekels ($50 million) next year. As well as funding research and development, it is promoting an international water technology and environmental control trade fair in Tel Aviv at the end of October.

ORI YOGEV, CHAIRMAN OF WATER Fronts, a non-governmental organization founded two years ago to bring together industry, scientists and venture capital, predicts: "Israel will become a leader in the advanced water solutions global market." Yogev, a former Finance Ministry budget director now in private business, adds: "You can see all over the world that business, governments and media understand that Israel is a power in the industry."

Tahal, for instance, signed a multi-million-dollar, 15-year framework agreement in May with Botswana to develop the southern African state's water-supply infrastructure and commercial agriculture. The Tel Aviv-based company announced that the Zambezi Integrated Agro-Commercial Development Project would provide the necessary infrastructure. "This includes on-farm water distribution systems, agricultural machinery and the implementation of commercial agricultural businesses," it said. Subject to feasibility studies, the first phase is expected to cost $450 million and a second phase up to $300 million. Tahal has also signed a deal with Angola, which company executives say is worth "more than $100 million, but less than $300 million."

Big players are starting to invest in Israeli water technology. Veolia Environnement, a French world leader in environmental services, announced in May that it planned to double its investment in Israel to $2 billion over the next six years, much of it in water technology. Uri Starkman, chairman of its Israeli subsidiary, said areas in which it was interested included land decontamination and water purification facilities as well as privatized water and sewage systems. Veolia is already a partner in Israel's first large-scale desalination plant in Ashkelon, completed in 2005 at a cost of $250 million and pumping 100 million cubic meters of pure water a year.



CLASSROOM AND BOARDROOM (above) BGU's Prof. Adar with a bioreactor where 'gray water' is filtered through a green plant, outside his Sde Boker lab; and (right) aquabusinessman Booky Oren

International giants Siemens and General Electric are setting up water research and development facilities in Israel. Local venture capitalists entering the market include Morris Khan, the former owner of Amdocs, the Ra'anana-based communications software provider, and Nochi Dankner's IDB, Israel's largest investment company.

Shari Arison, the billionaire cruise ship heiress and owner of Bank Hapoalim, last year earmarked an initial $100 million to seek and develop new ideas in the field. To head the team she hired Booky Oren, who, as chairman from 2003 to 2006, turned Mekorot around. "We are going to be a significant player in water activity," he told The Jerusalem Report in an interview in a Tel Aviv coffeeshop. "Our base will be in Israel, but we will work globally."

COURTESY OREN

Oren, an eloquent salesman-manager, also serves as president and CEO of the Israeli Water Technology Initiative, a government enterprise which is organizing the trade fair. He brings a missionary zeal to the job. "I want to position Israel as the Silicon

valley of water technology," he says. "I see a global problem that we look at as a global challenge. We hold a lot of solutions for it in Israel."

He identifies three things that give Israel a head start: a varied climate that makes it a global laboratory; long experience of combating drought and rapid population increase; and entrepreneurial spirit.

"The climatic conditions of Israel," he argues with a touch of hyperbole, "reflect climatic conditions in more than 50 percent of the world. Tel Aviv is like California, Beersheba is like Nevada, Jerusalem and Haifa are like the southern Midwest. We don't have the Himalayas, but all other conditions you can find here. You can develop things for the whole world.

"Because we have coped with drought conditions for 100 years and with a population that has increased by 10 times in the last 60 years, we have become number one in the world in producing solutions to the gap between water supply and demand. Israel is the most developed country in irrigation technology. The biggest desalination plant in the world based on reverse osmosis is in Israel, in Ashkelon. About 75 percent of effluents are purified and we use them for irrigation. We have developed a very advanced water management system. In Jerusalem when you open your tap, you don't have a clue whether the source is the Sea of Galilee, desalination from Ashkelon, or deep wells near Beersheba."

Eilon Adar, director of Ben-Gurion University's Zuckerberg Institute for Water Research, shares his bullishness. "Water is running in Israel 365 days per year, 24 hours per day," he enthuses in the Institute's gleaming new building on the dusty Sde Boker desert campus, across from the tomb of David Ben-Gurion, Israel's first prime minister. "That's a luxury in the Middle East. That's not the situation in Amman, not the situation in Damascus. The economy is booming, and water is not a limiting factor. Water is being tagged worldwide as a commodity. There's a lot of innovation in the Israeli academy. So everyone is looking at how we can improve the quality of existing water and how we can come up with new water."

The professor complains, however, that there is a gap between what the academics produce and what the businessmen invest in. "They do not speak the same language," he says. "They are hesitating to risk their money. They say they invest capital when they see light at the end of the tunnel. Even if they understand that the scientific feasibility of a project has been proved, they want confirmation that it can be transformed into a product. They say it's too risky to invest because maybe 5 percent of all these innovations are mature enough to work.

To bridge that gap, Adar's institute has established a pilot laboratory in its back yard, the first in the country, where researchers and engineers can build working scale models of their inventions. "We can come now to the entrepreneurs," he boasts, "and say, look there is the potential. The mechanical feasibility has been proven on top of the scientific feasibility. It's a big step. Most of them can understand that. They can start then to assess the mode of operation. They are not willing to take it from my lab, but they will take it from the pilot lab."

THE GOVERNMENT HAS ALSO funded two water technology incubators, at Tzemach on the southern shore of Lake Kinneret and Ashkelon, where researchers and entrepreneurs can cooperate to put promising ideas into practice. But Avner Adin, head of the Hebrew University's department of soil and water sciences, contends that Israel is still not doing enough if it wants to realize its potential in the world arena. Trigger-Foresight, a Tel Aviv strategic consultancy commissioned by the government and Mekorot, recommended that the state invest 700 million shekels ($175 million) in water technology. So far, only the 160 million shekels have been delivered.

"They have to be congratulated for that," Adin, the elder statesman of Israeli water research, concedes, "but most of this money has not reached either the academy or the industry. They need to find easier channels because there is a feeling across the board that while there was a very good will, the money is stuck somewhere. I hope there will not be frustration that will stop the whole process."

The incentive to succeed, however, is overwhelming. Worldwide demand for

WATER TECH A-T

AMIAD: Has been producing advanced water filtration systems at Kibbutz Amiad in Upper Galilee since 1962. Exports, among others, to China, Australia, Russia, India and South America. Will treat all the sewage from the Beijing Olympic village in 2008. Selected as prime contractor for turning sewage in Ra'anana, northeast of Tel Aviv, into irrigation water.

ARI: A leading manufacturer of innovative air-release and check valves for flow control in water supply, sewage, industry, agriculture and landscaping. Founded in 1970 at Kibbutz Kfar Haruv on the Golan Heights. Exports to 80 countries. Won contracts from the Moscow city water authority and valves for the biggest water pipeline in China.

ARKAL: Manufactures filtration systems that have been used to provide clean-water solutions in over 90 percent of the world's agricultural micro-irrigation markets. Based in Kibbutz Beit Zera in the Jordan Valley, it has grown at an average annual rate of 15 percent since 1992.

ATLANTIUM: Developed breakthrough technology that transmits ultra-violet light through optical fibers to disinfect water. Based in Beit Shemesh, halfway between Jerusalem and Tel Aviv, Atlantium's products are available in 120 countries around the world. Its investors include Arum, the investment firm of Amdocs founder Morris Kahn, and Israel's IDB investment group.

BERMAD: Develops state-of-the-art control valves at Kibbutz Evron in Western Galilee, where it was founded in 1965. Operates in over 80 countries on five continents. Municipal clients include Los Angeles, Sydney, Manchester, Milan and Jerusalem. Supplies water-management systems to high rises and shopping malls in Las Vegas, London, Shanghai and Eilat.

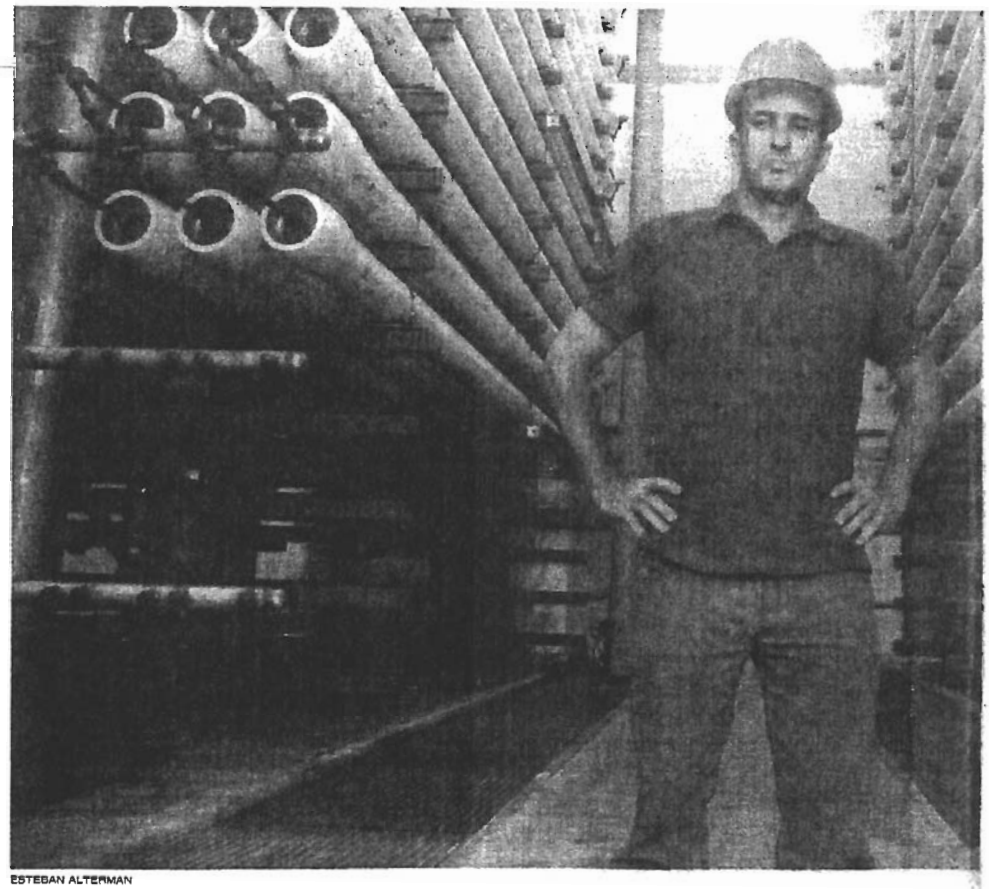
GES (Global Environmental Solutions): Leading player in water treatment and sewage purification in the municipal, agricultural and industrial sectors. Works on a large scale in Israel on water and environmental protection. Specializes in removing silt and contamination from wells. A partner in major seawater desalination projects.

(Continued on page 29)

water and advanced solutions can only increase. This year's world population is estimated at 6.6 billion. The United States Census Bureau predicts that it will grow to 9.4 billion by 2050. As living standards rise, in, say, China and India, so does water consumption. Eating habits change, as does personal hygiene. "In order to raise 1 kilogram of rice," says Booky Oren, "you need 1,500 liters of water. In order to raise a cow to supply one entrecote steak of 300 grams you need 6,000 liters of water." People shower more and flush more. Israelis consume about 100 cubic meters of water per capita per year; the average across the United states is 10-20 percent higher.

ALL THIS IS TAKING PLACE against a background of global warming, which is reducing supply from traditional sources. Australia is coping with its most severe drought in 100 years. In London, once lush Hyde Park turned yellow last summer. The United States is facing huge problems in Utah, Arizona and Texas. Experts blame global warming for at least half of the world's drought crises.

Desalination is the key. The oceans are not drying up. "Now that we know how to desalinate seawater," Oren argues, "it's become an economic issue. If you're prepared to pay the price, you can have all the water you need. It's become a question of money. Let's find the technology that will reduce the price, then we can satisfy demand. The one who knows how to close this gap will make a fortune."



ESTEBAN ALTERMAN

Israeli researchers are working on solutions for cheaper desalination of both seawater on the coast and brackish water inland, where the same techniques can be applied. Rafi Semiat, director of the Haifa Technion's Grand Water Research Institute, is optimistic, but careful not to overstate his case. The current target, he says, is an attainable 30-percent price cut. But he adds: "I don't see further reductions with current technology. It's a very difficult target."

With seawater, the professor sees the best approach as improving the membranes through which the water is pumped at high pressure to filter out the salt. More efficient membranes, he explains, could cut energy costs as well as reduce the size of the plant, with less investment necessary for pumps, piping and pressure vessels.

But in countries bigger than Israel the

Meanwhile, Down on the Farm

IN THE SMOKY, SOOT-GRIMED towns of the first industrial revolution, hard-nosed Northern English manufacturers used to brag, "Where there's muck, there's money." An Israeli firm, Global Environmental Solutions (GES), has given a whole new meaning to the old boast.

At its Hefer Valley plant in Western Galilee, it transforms manure from 8,500 cows into clean irrigation water, bio-gas, electricity and solid fertilizer. There is no waste water left over to contaminate the ground water.

The age-old practice of spreading raw manure as a fertilizer is going out in an ecologically aware world because plants do not consume all the contents. The residue is washed down through the soil and pollutes underground water sources. The GES facility, one of the biggest in the world, is one answer to the dilemma of how you dispose of it.

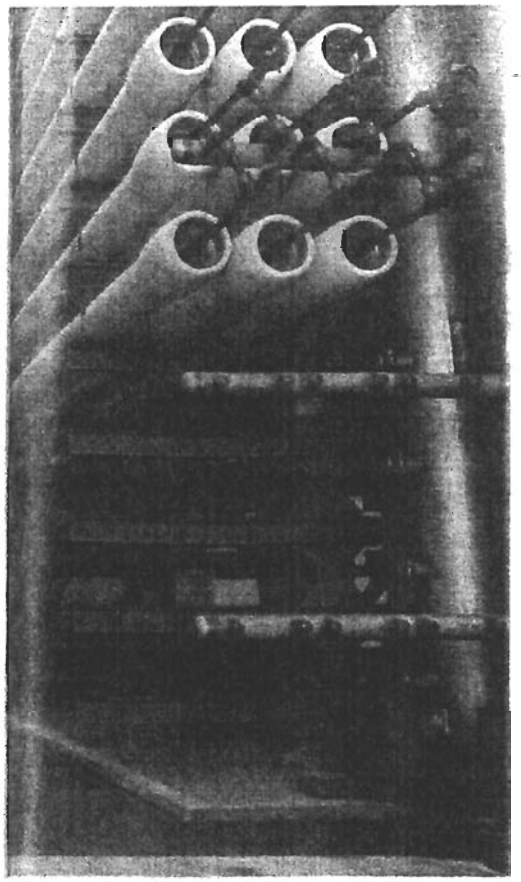
The plant is part of Israel's battle to preserve the quality as well as the quantity of its water. "Every year," says GES vice president Anat Algoa, "the health ministry is shutting more and more wells because of high salinity and organic contamination."

About 20 trucks collect 500 cubic meters of manure per day from farms all over the north and deliver them to the Hefer Valley site. The manure is tipped into sealed containers, where it is eaten by special bacteria in a process known as anaerobic digestion.

What is important, Algoa explains, is that the temperature is held steady at 35-40 degrees Celsius and that there is no oxygen. "As a result," she says, "we get methane gas and residual sludge. The sludge is then filtered to produce solid fertilizer and water suitable for irrigation."

This summer GES is starting to use the two megawatts of biogas the plant produces per year to turn turbines and generate electricity, which will be fed into the national grid. The plant, which has been running for three years, currently breaks even. Algoa expects the planned three megawatts of electricity a year will thrust it into the black. The process is not new, but she claims that the firm's experience and know-how gives it an edge.

In a different approach, Ben-Gurion



ESTEBAN ALTERMAN

THE BIG AND THE BEAUTIFUL: Tahal engineer Boaz Gazit with 'skids' used in the reverse osmosis desalination process, at the Palmahim plant (left); lettuce planted in different kinds of soil is irrigated with desalinated water at the BGU lab to see which combination of earth and water produces the best results

distance the purified water might have to travel to centers of population, agriculture and industry could still make it an expensive luxury. That is where desalination of brackish water, from underground or surface sources, could come into its own. The problem there is how to get rid of the salts left over after pure water has been extracted. While residual brine from desalinated seawater can be pumped back into the sea, the concentrated salts extracted from brackish water in the desalination process would, if dumped, pollute the underground aquifers.

"The best approach," Semiat says, "is to change the physical condition of the solution in order to cause the excess salts to precipitate. That way you get rid of the salts and end up with more water. The salts could then be stored safely in dump areas."

Israel is not, however, the only player in the field. The United States, Australia and China are all working on desalination technology. Israel's competitive advantage is its experience. Before the Ashkelon plant, an Israeli firm, IDE Technologies, built smaller facilities in Eilat and Cyprus. The lessons were applied for the bigger plant.

By contrast, the most ambitious American seawater desalination plant, at Tampa Bay in Florida, is six years behind its original schedule. Three of the companies involved went bankrupt. Although it was announced before the Ashkelon project, Tampa Bay is not expected to be fully operational before early 2008.

Israel is leading in the home straight, but the race is still open. ●

University scientists have recently come up with a method of extracting the nutrient-plants need from manure next to the farm. "We developed a reactor that digests and ferments the manure," Eilon Adar, the Negev university's director of water research, says. "This produces ammonia, which can be converted in such a way that you get a concentrated liquid rich in nitrates, free of viruses, which can be used as a liquid fertilizer. The sludge left behind can be used as compost without fear of contaminating the environment."

The professor sees a double benefit for the farmers. "Maybe on a village scale, or even big cattle or chicken farms, instead of getting rid of the manure every few months, it will be collected into another production line. The farmer will not have to pay to get rid of it. He will have his own plant producing fertilizers." ●

E.S.

WATER TECH A-Z

(Cont. from page 27)

IDE: World pioneer in research and development of desalination processes, concentration of industrial streams and wastewater treatment. From its base in the Sharon Industrial Park north of Tel Aviv, IDE has designed and supplied over 360 plants in nearly 40 countries. Projects include seawater desalination plants in Israel and Cyprus. High-profile customers, it lists Anglo-American in South Africa, Bechtel in Britain and Lego in Denmark.

MEKOROT: Government-owned water company that supplies Israel with 1.3 billion cubic meters of water per year, which accounts for 90 percent of all drinking water and 70 percent of water as a whole. Has annual sales of $500 million. The National Water Carrier, which it built 40 years ago to distribute water from Lake Kinneret to the center and south of the country.

NA'AN DAN: Develops, manufactures and markets advanced irrigation technologies, specializing in large-scale agricultural projects. Formed in 2001, it now has subsidiaries in the United States, Europe, Australia and Latin America. Jain Irrigation Systems, an Indian agricultural conglomerate, recently bought a 50 percent stake in Na'an Dan at a company valuation of 140 million shekels (about $35 million).

NETAFIM: Founded in 1965 at Kibbutz Hatzerim near Beersheba, in partnership with Kibbutz Magal and Kibbutz Yiftah, the company invented drip irrigation, which is revolutionizing farming and horticulture around the globe. Now the world's largest low-volume irrigation company with corporate offices in Tel Aviv, it has annual sales of over $350 million.

PLASSON: Makes plastic products for the water, gas and telecommunications industries. With annual turnover topping 473 million shekels ($115 million) and 550 employees, it now has subsidiaries in Britain, Australia, Germany, France, Italy and Brazil.

TAHAL: Since its foundation in 1952, Tahal has designed and carried out major water-related engineering projects in over 50 countries worldwide. In the last year, it has signed deals for major projects in the Istanbul municipal area of Turkey, in Malta and for an urban major water infrastructure in India. ●

E.S.

HOSPITAL ASSOCIATION
of San Diego and Imperial Counties

5575 Ruffin Road
Suite 225
San Diego, CA 92123

(858) 614-0200
Fax: (858) 614-0201

September 28, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Poseidon Resources' Carlsbad Desalination Plant
Please note that a copy of this letter has been sent to all Commissioners and staff members.

Dear Commission Members:

I am writing on behalf of the Hospital Association of San Diego & Imperial Counties (HASD&IC) in support of the Carlsbad Desalination Project.

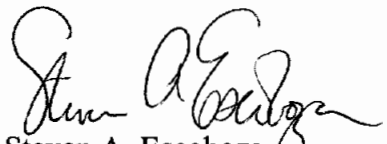
Established in 1956, HASD&IC is a non-profit organization providing leadership, representation and advocacy on behalf of over 35 hospitals and integrated health systems in the two-county region. Our member hospitals range from small, rural hospitals to large, urban medical centers and represent over 8,000 licensed beds. HASD&IC provides strong leadership, representation and advocacy with local governmental entities, business coalitions, the media, community organizations, and the public.

San Diego is experiencing a severe drought and it has been reported the region will be faced with massive cutbacks in imported water supplies in the coming year. We have grave concerns that San Diego's healthcare providers will be significantly affected if basic resources like water are unavailable or in short supply in the near future.

HASD&IC's members are located throughout San Diego County, including many areas that will directly benefit from the new desalinated water source. The Carlsbad Desalination Project will provide enough water to serve as much as 10% of the total population. The water will be affordable, reliable and drought-proof. Most importantly, it will be produced locally with an endless supply of seawater and will reduce our need to import water from drought-stricken regions.

To ensure that our members can continue to serve the population with quality patient care services, San Diego must have a reliable water supply and therefore must improve and diversify our sources for potable water. The board, staff and members of HASD&IC urge you to support the Carlsbad Desalination Project.

Thank you,



Steven A. Escoboza
President and CEO
Hospital Association of San Diego and Imperial Counties

cc: Richard Liekweg – Chair, HASD&IC Board of Directors

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Suja Lowenthal
Commissioner Lorena Gonzalez
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Senate President Pro Tem Don Perata

Secretary Mike Chrisman
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Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Martin Garrick
Assemblymember Lori Saldana
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas
Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Coastal Commission staff has received a copy of the enclosed communication.

RECEIVED
SEP 2 4 2007
CALIFORNIA
COASTAL COMMISSION

HUBBS-SEAWORLD RESEARCH INSTITUTE
CELEBRATING FOUR decades of Scientific Excellence

September 17, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

Dear Commission Members:

At its November public hearing the California Coastal Commission will consider the merits of the Carlsbad Desalination Project. I represent Hubbs-SeaWorld Research Institute (HSWRI), an independent, not-for-profit, scientific research organization, which operates the Leon Raymond Hubbard, Jr. Marine Fish Hatchery, a 20,000-square-foot hatchery at the Agua Hedionda Lagoon, the site of the proposed desalination plant.

HSWRI is dedicated to ensuring that future generations experience the benefits of a healthy environment by working to conserve the ecosystem integrity of our oceans and estuaries as a foundation for sustainable fisheries, public recreation, transportation, tourism and quality of life.

HSWRI has studied the proposed desalination project to ensure that it would not have a negative impact on our operations. In fact, we find that it was designed and sited very thoughtfully and includes adequate coastal protections and mitigation measures to ensure the health of the marine ecosystem. Also, Poseidon Resources has pledged to continue the stewardship of the Agua Hedionda Lagoon when the current caretaker, the Encina Power Plant, is decommissioned. Without the desalination facility's management, the lagoon would quickly return to its former hyper-saline anoxic state. This would preclude our research facility and numerous local businesses from operating there as well as diminish public access to the lagoon.

After careful review of the proposed project, we believe that it is consistent with the goals and policies of the California Coastal Act. This project strikes a balance between sound environmental practices, public access and recreation, and economic necessity.

Hubbs-SeaWorld Research Institute believes that this project will be economically and environmentally beneficial for the entire San Diego region. We respectfully recommend your approval at the November hearing.

Sincerely,

Donald Kent
President and Chief Executive Officer
Hubbs-SeaWorld Research Institute.

2595 Ingraham Street | San Diego, CA 92109 | T: 619.226.3870 | F: 619.226.3944
6295 Sea Harbor Drive | Orlando, FL 32821 | T: 407.370.1650 | F: 407.370.1659 | www.hswri.org

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

James B. Wright
1344 Corvidae Street
Carlsbad, CA 92011-4851

September 13, 2007

California Coastal Commission
Attention: Chairman Pat Kruer
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RECEIVED
SEP 2 4 2007
CALIFORNIA
COASTAL COMMISSION

Dear Commissioners:

As a retired engineer with significant experience in water desalination and a Carlsbad resident, I'm writing you regarding the proposed Carlsbad desalination project. I understand that the Commission will be evaluating this project in November and voting on whether or not to issue a coastal development permit. I am a strong supporter of the desalination plant and I urge you to vote in favor of granting the permit.

My home is located in the Aviara neighborhood of Carlsbad, near the Four Seasons Hotel and immediately south of the Agua Hedionda Lagoon. I truly appreciate living in such a beautiful city and frequently enjoy trips to the nearby beach and lagoon recreation areas. I understand that the Carlsbad Desalination Project will become the main caretaker for the lagoon in the event of the power plant's decommissioning and I am relieved that this regional jewel will not be abandoned or mismanaged.

I also am proud that our city has taken such a proactive stance in securing water for its residents. With an unlimited supply of ocean water, the Carlsbad desalination project will provide one of the few reliable, drought-proof supplies of drinking water for the county. The partnership between Poseidon Resources and Carlsbad means that our needs will be met at no additional costs or risks to us, the taxpayers. With the looming imported water supply cutbacks about to hit our region, the timing for this project couldn't be better. This is government planning at its finest.

I have spoken with many of my neighbors and we are all in agreement. The Carlsbad Desalination Project is good for Carlsbad and good for our entire region. Please approve this project.

Sincerely,

James B. Wright

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
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Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Carlsbad
california

September 6, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project

Dear Commissioners:

This letter, which is on behalf of the Carlsbad Convention of Visitors Bureau, is intended to show our unanimous support of the Carlsbad Desalination Project.

The Bureau is a destination marketing organization that actively promotes the City of Carlsbad as a year-round preferred vacation destination. Our organization offers hospitality and information about lodging, dining, arts & outdoor attractions, shopping, and transportation in Carlsbad. Every year, hundreds of thousand of visitors come to enjoy Carlsbad's great beaches, world-class resorts, shopping, restaurants and local attractions, like LEGOLAND and The Flower Fields. With the continued build out in Carlsbad, the City now supports nearly 40 hotels to accommodate these guests.

As our local hospitality industry continues to grow, it is imperative that a dependable and safe drinking water supply be available to meet the needs of these guests. That is the Board of Directors of this organization has voted unanimously to support the Carlsbad Desalination Project.

The desalination plant will provide Carlsbad – residents and visitors – with its entire daily requirement for water, up to 25 MGD. Under the public-private partnership with the City, Poseidon Resources will assume all risks associated with the financing, development, construction and operation of the project.

The Bureau believes that this project provides the absolute best alternative for our region in diversifying our water supply with a locally produced, drought-proof supply. With the recent announcement about reductions in imported supplies, the approval of this project is more crucial now than at any other point of development.

Carlsbad Convention & Visitors Bureau
400 Carlsbad Village Drive, Carlsbad, California 92008
(760) 434.6093 • FAX (760) 434.6056 • www.visitcarlsbad.com • info@visitcarlsbad.com
"The Official Destination Marketing Organization of Carlsbad, California"

Equally as important to the travel, tourism and visitor industries, the construction and location of the desalination plant is consistent with the City's long-term vision for its coastal zone. Many of our hotels and visitor attractions are located along or near the coast, and it is imperative that natural habitat and coastal resources are protected.

The Carlsbad Convention of Visitors Bureau offers its unwavering support and urges you to approve the Carlsbad Desalination Project at your November public hearing.

Sincerely,

Nancy Nayudu, Chair
Carlsbad CVB Board

Kurt Burkhart, Executive Director
Carlsbad Convention and Visitors Bureau

cc:

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Suja Lowenthal
Commissioner Lorena Gonzalez
Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President Pro Tem Don Perata
Secretary Mike Chrisman
Mr. Barry Sedlik
Director Lester Snow
Senator Dennis Hollingsworth
Senator Jim Battin
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Assembly Member George Plescia
Assembly Member Kevin Jeffries
Assembly Member Martin Garrick
Assembly Member Lori Saldana
Assembly Member Joel Anderson
Assembly Member Shirley Horton
Assembly Member Mary Salas
Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones
Mayor Bud Lewis & Council Members

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SEP 2 4 2007

CALIFORNIA
COASTAL COMMISSION

WILLIAM J. CARROLL
2315 Rue des Chateaux, Carlsbad, CA. 92008

September 17, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA. 94105
Attention: Chairman Pat Kruer

Subject: Carlsbad Desalination Project

Dear Commissioners: (This letter is being sent to all Coastal Commission Members and Staff).

My name is William Carroll and I live at the above address in Carlsbad. I am writing to you as a private citizen, a retired Civil Engineer and as Chairman Emeritus of Montgomery Watson Harza. My old Company has designed Water Treatment Plants all over the world, and is very experienced in Reverse Osmosis technology. My Company was deeply involved in the design of the Weymouth, Jensen and Skinner Filtration Plants for the MWD of Southern California, and the Alvarado and Miramar Filtration Plants for the City of San Diego.

The Carlsbad Desalination Project is an important component to the region-wide effort to improve and diversify our local water supply. The San Diego County Water Authority has embraced the project as a key component of the regions water management plan to protect the county against drought conditions and potential disruptions to the region's imported water supply. I believe that this project is highly necessary for the long-term health and safety of our community.

Personally, I have a home located on our beautiful beach here in Carlsbad, and I feel strongly about the protection of our coastline and lagoons. I am a member of the City of Carlsbad's Beach Preservation Committee.. Years of research by some very competent people has demonstrated that this project will have no significant impacts to our marine life and coastal environment. I was pleased to see that Poseidon has thoughtfully sited their facility away from the coast, allowing for maximum public access to the beaches and lagoon recreation areas.

I know that the Commission is currently reviewing this project and will hold a public meeting in November to decide if the project should be granted a Coastal Development Permit. I believe strongly that this is the right project for Carlsbad and many other water agencies in San Diego County and now is the very important time for the project to be authorized and move forward with construction and operation. It is my understanding

that 93% of the total capacity of the plant has now been contracted for by seven local water agencies

I urge you to please approve this critical project and bring our City of Carlsbad and our County of San Diego one step closer to improving and safeguarding our water supply.

Sincerely

William J. Carroll

Past President: American Society of Civil Engineers
American Academy of Environmental Engineers

Member: National Academy of Engineers (U. S.)
Russian Academy of Engineers
Pan-American Academy of Engineers

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
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Assemblymember Mary Salas
Lt. Governor John Garamendi
Controller John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

August 29, 2007

****All Coastal Commission members and staff have received a copy of this letter****

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Commissioners:

I am writing in support of the Carlsbad Desalination Project (Coastal Development Permit Application No. E-06-013).

I am the Executive Director of the Carlsbad Village Business Association (CVBA), a non-profit membership organization established for the purpose of promoting and supporting businesses located in Carlsbad Village. CVBA membership is wide and diverse, comprised of approximately two hundred gift and clothing boutiques, eateries, jewelry stores, antique shops, specialty shops, toy stores, salons, professional services, spas and a winery. The majority of these businesses are small and owner-operated, creating a more personal and inviting experience for visitors.

One of our primary concerns regarding major infrastructure projects is the disruption to our businesses that can occur during construction. We have thoroughly reviewed the Carlsbad Desalination Project and have concluded that it will have no negative impacts on our downtown during construction.

Looking into the future, the project will have many quantifiable benefits to our community. First and foremost, there will be hundreds of new jobs created that will directly benefit our local economy. Secondly, the project brings in a new local source of water that will supply all of Carlsbad with high-quality, affordable drinking water. This ensures that our community will have more than enough water, regardless of the drought situation that is currently affecting imported supplies. Third, the desalination plant will act as caretaker to the Agua Hedionda Lagoon, which is used by residents and tourists for water sports and recreation. These lagoon users bring in a great deal of business to our downtown area and we are supportive of any project which helps to secure the long-term health of our lagoon.

In closing, we are confident that the desalination plant will be a benefit to many Carlsbad Village businesses and my entire board wholeheartedly supports this project. We ask that the Commission weigh the vast public support for this project during the public hearing and vote to approve the Carlsbad Desalination Project.

Thank you for your time.

Robin Young

Robin Young
Executive Director

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Note: A copy of this letter has been sent to Coastal Commission staff.

August 28, 2007

California Coastal Commission Members and staff
45 Fremont Street, Suite 2000
San Francisco, CA 94105

To Whom It May Concern:

This is my second letter to the Coastal Commission regarding the Carlsbad Desalination Plant. I felt it was important to notify the Commission members of how their decision on this project will affect numerous business owners at the Agua Hedionda Lagoon.

My company, Carlsbad Aquafarm, is only a small part of the $1 billion US aquafarming industry, but we have 20 employees and produce over one million pounds of oysters and mussels each year. By providing a farmed seafood source, my company helps reduce the toll that overfishing takes on the ocean.

As I've written before, Carlsbad Aquafarm can only exist because of the pristine condition of the Agua Hedionda Lagoon. The maintenance and dredging of the lagoon by the Encina Power Plant has provided the clean water and beaches we need to ensure the quality and purity of our farmed product.

However, we know that the power plant could be decommissioned in the near future, leaving our lagoon without a caretaker unless the Carlsbad Desalination Plant is approved and built. As part of their agreement, the desalination plant will provide lagoon dredging to keep the mouth of the lagoon open. The constant tidal flushing will keep the lagoon healthy and prevent it from returning to its prior stagnant, marshy environment.

Without the desalination plant and Poseidon Resources' stewardship of the lagoon, the future of our business could be negatively impacted. As a business owner who is dependent upon a healthy lagoon to maintain a healthy business, I urge you to please approve the Carlsbad Desalination Plant in November.

Thank you,

Andrew Davis

cc.
Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Mr. Barry Sedlik
Director Lester Snow

Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
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Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

THE FLOWER FIELDS

RECEIVED

AUG 2 4 2007

CALIFORNIA
COASTAL COMMISSION

August 21, 2007

Commissioner Pat Kruer, Chair
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

**** Coastal Commission staff has received a copy of the enclosed communication ****

RE: Carlsbad Desalination Project
Coastal Development Permit Application #E-06-013

Dear Chairman Kruer,

I am the Director of Group Sales and Special Events at The Flower Fields® located in the coastal zone in Carlsbad, CA. We operate the only working ranunculus field in the world that is open to the public, and I am writing you in support of the Carlsbad desalination plant.

The Flower Fields has been an important part of Carlsbad's local heritage for over 60 years and attracts over 150,000 visitors to our coastal property overlooking the Pacific Ocean each season. Each spring, The Flower Fields dazzle visitors with over 50 acres of Giant Tecolote Ranunculus, roses, poinsettias and orchids. Approximately 6-8 million ranunculus bulbs are harvested each season and sold at nurseries and garden centers across the country. We also provide educational activities for children, including classroom presentations, activity sheets, field trips and an on-site growing program, and composting workshops for adults.

With the dry weather conditions our region has experienced in the past few years, irrigation water has been a necessity for the survival of our operations. As participants in Metropolitan Water District's discounted agricultural program, we have recently learned that there may be an enforced 30% reduction in agricultural water supplies due to California's overall decline in water supplies (see attached *North County Times* article). This will be the first time in the program's 13-year history that agricultural users have been ordered to cut water usage.

Without doubt, this will have an extremely negative effect on our agricultural operations and that of many of our farming neighbors, including Carlsbad Strawberry Company, another visitor serving business in the Coastal zone of Carlsbad, which operates a "U-Pick" strawberry field for the public. Many farms will have no option but to reduce the size of their crop planting to compensate for the reduced water supply. This will drastically affect their ability to survive and could lead to the loss of numerous small farming businesses in North San Diego.

One of the few options our region has in dealing with the reduction in imported water is to diversify and increase the local water supplies through desalination. We believe that Poseidon Resources' Carlsbad Desalination Project has been well-conceived, has undergone rigorous testing to ensure water quality and environmental safety, and will provide multiple benefits to our entire region.

A reliable and affordable water supply is crucial to the survival of The Flower Fields and hundreds of small farming operations in San Diego. We strongly urge the Coastal Commission to approve the Carlsbad Desalination Project during their November public hearing.

Sincerely,

Joni Miringoff

Joni Miringoff
The Flower Fields

cc.

Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Mr. Barry Sedlik
Director Lester Snow
Senator Dennis Hollingsworth
Senator Jim Battin

Commissioner Khatchik Achadjian
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Commissioner Michael Genest
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Commissioner Anne Sheehan
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Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

NORTH COUNTY TIMES

AG WATER SUPPLY:
Strawberry, flower fields fret at threats to water supply

8/18/07

By Barbara Henry, staff writer

CARLSBAD ---- The city's two biggest consumers of agricultural water say they are worried about a proposal by the region's main water provider to cut agriculture water use by 30 percent, a move that county farm bureau officials say means some growers are going to have to reduce their crops.

In the case of The Flower Fields ---- Carlsbad's famed floral tourist attraction ---- the water cuts may mean starting to use reclaimed water, or intensively treated sewage water, next spring to keep the flowers at their prime, said Fred Clark, general manager of The Flower Fields.

"We have our fingers crossed that we're going to have a nice rainy year next year," he said.

Meanwhile, Carlsbad Strawberry Co. General Manager Peter Mackauf said he won't be making any decisions until he attends a presentation by the region's farm bureau next month on the local water situation.

The situation doesn't look good right now, Metropolitan Water District spokesman Bob Muir said last week. The Los Angeles-based Metropolitan Water District, which provides most of the water that Southern California residents drink and farmers use on crops, announced months ago that it is likely to order agricultural water users to cut back on their irrigation starting Jan. 1.

The district's board is expected to vote on the current proposal for a 30 percent water cutback in October.

A discount water deal

Metropolitan officials say the reduction is one of several proposed ways to combat a series of water supply troubles. Those problems include several years of dry weather locally, smaller snowpack levels in the Sierra Nevada mountains and continuing difficulty in obtaining water from the Sacramento Delta region. Farmers who obtain their irrigation water through the agency's agricultural program are first in line for cutbacks, because that's the deal they made when they signed up for the program, which offers them water at discount prices.

Regular wholesale water from Metropolitan costs $331 per acre-foot. Agricultural customers pay $241 an acre-foot. A single acre-foot equals about 326,000 gallons, or enough water for two average families for a year, Muir said.

The price that individual farmers pay varies depends on where they live, Muir said.

In addition to Metropolitan's pipes, the water must pass through the San Diego County Water Authority's system and ultimately through local distribution systems before arriving at the farms.

If the cuts go through as planned, this will be the first time in the agricultural program's 13-year history that its users have been ordered to cut water usage, officials said.

Making the cut

Carlsbad has 25 participants in the regional agricultural water program. The Flower Fields and the strawberry fields are the city's two biggest users, Carlsbad Water District Director Mark Stone said.

In all, the city's top five participants consumed 100 million gallons of agricultural water during the fiscal year ending June 30, said Cari Dale, the water district's assistant general manager.

Carlsbad's participation rate is far lower than that of the inland agricultural areas of Fallbrook and Valley Center, said Eric Larson, head of the San Diego County Farm Bureau.

"In Valley Center, the vast majority of the water sold by the (local) water district is agricultural water. ... This is huge for them, as it is in Fallbrook and Rainbow," he said.

The farm bureau is putting together plans for a "water summit" Sept. 27. The event will begin with an assessment of regional water supply levels, with best- and worst-case scenarios, Larson said. Next, participants will move into a trade show where they can meet with manufacturers of irrigation equipment and other water-saving items, he said.

Improving the efficiency of irrigation is likely at best to cut only 5 percent to 15 percent of a farmer's water usage, Larson said. Most growers already use plenty of water-saving equipment, because water costs so much in Southern California, he said.

In order to reach Metropolitan's currently proposed, 30 percent cutback, growers are going to have to reduce their crops ---- say, for example, plant fewer strawberries this year, Larson said.

Seeking other sources

Those decisions are going to have to be made soon. Carlsbad's strawberry crop, which is concentrated along the north side of Cannon Road just east of Interstate 5, has its heaviest watering periods in the fall and spring, Mackauf said.

The Flower Fields, which occupy the highly visible northeast corner of Palomar Airport Road and Paseo del Norte, draws much of its water during the winter and spring months, Clark said.

"Right now, most of our fields are bare," he said.

There is a backup plan in place for The Flower Fields. The area is already plumbed for reclaimed water, Clark said. Reclaimed water ---- intensively treated sewage water ---- flows through pale purple pipes in a number of parts of town, particularly in the city's central region. It's used for landscaping irrigation in roadway medians.

Some agricultural crops can be hypersensitive to reclaimed sewage water because it typically contains more minerals than regular irrigation water, Clark said. However, he added, The Flower Fields' famed ranunculus blooms don't have that problem.

Reclaimed water won't help the strawberry fields, though. Because they're an edible crop, they can't be irrigated with reclaimed sewage water, Mackauf said.

He and other growers also can't choose to drop out of the agricultural water program and pay full price for their water in effort to avoid the cutbacks. In order to prevent that tactic, Metropolitan and the other water districts have a system of fines and other measures.

The point of having a discount program where people agree to cutbacks in times of water shortage would be defeated if participants had the option of avoiding cutbacks by switching over to the regular program, Muir of the Metropolitan district said.

California Coastal Commission
45 Fremont Street
San Francisco, CA 94105-2219

8-7-07

Dear Chairman Kruer and Commissioners;

We strongly support the Poseidon Company and the City of Carlsbad's desalination facility at the current Encina Power Plant location. We are both lifetime residents of San Diego County and understand that almost all of our potable water is imported from either Northern California or the Colorado River. Despite the deal with the Imperial Irrigation District, it is blindingly obvious that as our area continues to grow, (and it always has!), there is a limit to how much water will be available.

It seems to us that technology and the economics of reverse osmosis have now reached the point that the time to implement RO on a large scale is now. At this point it costs as much to send the water to us in San Diego County from the State Water Project as it does to produce the water locally from our adjacent ocean. We have reviewed the EIR carefully and feel that concerns about negative impacts on the ocean have been adequately addressed.

Therefore, we urge the Coastal Commission to grant the Coastal Commission Permits to Poseidon at your November hearing here in San Diego. Then we can get busy with becoming as locally independent as is humanly possible in our arid climate.

Sincerely,

Anne Omsted

Anne Omsted

Donald Omsted

Donald Omsted

1349 Rainbow Ridge Lane,
Encinitas, CA 92024
760-753-6970

Received
AUG 13 2007
California Coastal Commission
San Diego Coast District

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AUG 13 2
California Coastal Co[illegible]on
San Diego Coast District

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CALIFORNIA
COASTAL COMMISSION

Seabright Carlsbad

HOMEOWNERS ASSOCIATION
C/O G.R.G. MANAGEMENT, INC.
P.O. BOX 1186, CARLSBAD, CA 92018 * Email: deni@grgmgmt.com
760-720-0900 * Fax 760-720-0085

July 30, 2007
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Carlsbad Desalination Project
Coastal Commission staff have also received a copy of this letter

Dear Members of the Commission:

The Board of Directors of the Carlsbad Seabright HOA, urged by its residents, has unanimously voted to support the desalination plant in Carlsbad. Seabright consists of 110 single-family homes. We use reclaimed water to irrigate our common areas. Individual homes rely on potable water provided by the Carlsbad Water District.

We are very aware of the need to reduce our use of water from the Colorado River and the Sierra snowpack. Having another reliable source of water is extremely important to the citizens of Carlsbad, San Diego County and, in fact, to all of California.

We believe the Commission should approve this project. There are no significant negatives and an enormous number of positives. The periodic lack of rainfall, which we are experiencing again this year, makes it more essential that we develop this source of water for the benefit of all.

For the Board of Directors

Deni Diedel
GRG Management Inc.

cc: (see over)

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
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Commissioner April Vargas
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Commissioner Brooks Firestone
Commissioner Trent Orr
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Governor Arnold Schwarzenegger
Speaker Fabian Nunez
Senate President ProTem Don Perata
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Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
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Assemblymember George Plescia
Assemblymember Kevin Jeffries
Assemblymember Mimi Walters
Assemblymember Martin Garrick
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Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary Salas
Assemblymember Bob Huff
Assemblymember Jim Silva
Assemblymember Van Tran
Assemblymember Chuck DeVore
Assemblymember Todd Spitzer
Assemblymember Mike Duvall
Commissioner John Garamendi
Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

Briggs Tree Company, Inc.
- a wholesale nursery -

RECEIVED
JUL 11 2007
CALIFORNIA
COASTAL COMMISSION

June 29, 2007

Commissioner Pat Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

I am writing to you about a matter of grave concern to me and to many others working in the agriculture industry. The recent announcement by Metropolitan Water District that there may be cuts in the water supplies for North County farmers came as an unexpected and unhappy surprise.

Farming is a major industry in San Diego County. There are thousands of small, family-owned farms which together contribute more than $1.4 billion to the local economy. Reasonably priced irrigation water is of vital importance to the health and survival of San Diego's farming industry. A thirty percent cut in our water supply could force many farmers out of business and result in job losses throughout the county.

Local farmers are very concerned about the potential for widespread catastrophe in the farming community that a water cutback would mean. That is why we are in support of the desalination facility that is being proposed by Poseidon Resources and the City of Carlsbad. The facility would guarantee a cost-certain, drought-proof supply of water that would ease the burden on our imported supplies and ensure that farmers don't lose their water deliveries.

Farmers throughout San Diego County are widely in support of this project and would appreciate your approval of the Carlsbad Desalination Plant.

Sincerely,

Don R. Dabbs

Don R. Dabbs
General Manager

Enclosure

cc: Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett
Senator Dick Ackerman
Senator Tom Harman
Assemblymember George Plescia

1111 Poinsettia Avenue, Vista, CA 92081
(760) 727-2727, fax: (760) 727-5312
www.briggstree.com

cc: Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
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Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

THE CALIFORNIAN
NC TIMES NET
AN EDITION OF NORTH COUNTY TIMES
NORTH COUNTY TIMES

June 26, 2007

North County farmers bracing for water cutbacks

By: QUINN EASTMAN - Staff Writer

NORTH COUNTY -- Farmers across North County and their water suppliers said Monday they are beginning to prepare for water cutbacks this coming winter, in what one water official said could be the beginning of a "long-term shift" in North County's water resources.

Local water officials said they were dusting off plans that could put month-by-month caps on agricultural customers' water use and penalties for exceeding the caps.
"We are doubling our prayer efforts for a wet winter," said Chuck Badger, a lemon and orange grower in the Encinitas/Rancho Santa Fe area and president of the San Diego County Farm Bureau.

Supply reductions of at least 30 percent, compared with a still-undetermined reference year, could go into effect in January, barring exceptional weather before then.

The official call for cuts from Southern California's main water supplier, the Metropolitan Water District, is not expected until August or September, local water officials said.

Water can be one of a San Diego County grower's largest expenses, including labor. Some North County operations have yearly bills of several hundred thousand dollars.

"If we have 30 percent less water, we'll have to cut our crop by 30 percent," said Donnie Dabbs, manager of Briggs Tree Company in Vista. "Less product means hiring fewer people, from field workers to salespeople."

The Metropolitan Water District told member agencies last week to make a "reduction plan" for agricultural customers, who pay less for their water in exchange for being first in line for cuts.

"These are our marching orders, but we still have to figure out many of the details," said Keith Lewinger, general manager of Fallbrook's Public Utility District.

According to a blueprint last followed in the early 1990s, local water districts would allot agricultural customers month-by-month a certain percentage -- 70 percent, for example -- of their water usage in a recent "base year."

But which base year is most appropriate for allotment calculations still needs to be

worked out, Lewinger said.

The mood Monday among water officials was slightly brighter than last week because on Friday, a federal judge rejected a petition by two environmental legal groups to halt the pumps on the Sacramento-San Joaquin river delta to protect the delta smelt, an endangered fish.

"We dodged that bullet," said Gary Arant, general manager at Valley Center Municipal Water District, where about 80 percent of water goes for agricultural use.

But a meager Sierra snow pack and an ongoing drought on the Colorado River mean even if the ongoing legal issues surrounding the delta smelt are resolved, the water picture still looks bleak.

"This time around, we have more lead time (than in the 1990s)," Arant said. "But this could be the beginning of a long-term shift."

Avocado, citrus and ornamental tree growers around North County said they could respond to cutbacks this winter in a variety of ways, including planting fewer trees, accelerating when they pick fruit and reactivating unused wells.

They also said that landscaping takes up a sizable fraction of residential water use and that they thought agriculture shouldn't necessarily bear the pain alone.

Many avocado growers "stumped" fractions of their trees after this January's debilitating freeze, leading to the appearance of white skeletal groves along Interstate 15, North County's "Avocado Highway."

Stumped trees can still be regrafted, said Al Stehly, whose family's Stehly Grove Management cares for properties around the Valley Center area.

Stehly said he may reactivate some wells that were shut down years before because water coming from them had become too salty.

"Even for avocado trees, salty water may be better than none at all," he said.

Nursery operators say that, unlike fruit growers, less timing is involved in their all-year operations. Some don't take interruptible water supplies because of the higher value of their crops.

"We've had long-term plans in place to cut back water use anyway," said Janet Kister, who runs a commercial nursery in Fallbrook with her husband.

She said they are switching to more efficient drip irrigation, a investment that takes a few years to put in place but one that could reduce water use by about 30 percent.#

COASTAL COMMISSION
7575 METROPOLITAN DR. Stn 103
SAN DIEGO , CA 92108

TO WHOM IT MAY CONCERN

As a resident of Altamira #1 HOA, located in Carlsbad California, I am writing this letter to convey my support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

I feel it is essential that the city have a guaranteed future potable water supply. With an additional 50 million people estimated to be in California within the next 15 years, an additional water supply will be essential for the ongoing vitality of the City of Carlsbad and the State of California.

I cannot stress too highly my support for this proposed Desalination Plant and I hope that the Coastal Commission will give this plant and any future plants, heartfelt approval.

Mr/Mrs. HARRY A. MCMILLAN

Address: 817 CAMINITO DEL MAR

CARLSBAD, CA 92011-2402

Dated: 24 JULY 2007

Received
JUL 26 2007
California Coastal Commission
San Diego Coast District

COASTAL COMMISSION
7575 METROPOLITAN DR. Stn 103
SAN DIEGO , CA 92108

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Mr/Mrs. Daniel H. Jensen

Address: 6750 Cardino del Prado
Carlsbad, Ca. 92011

Dated: July 18, 2007

Received
JUL 20 2007
California Coastal Commission
San Diego Coast District

RECEIVED
JUL 25 2007
CALIFORNIA
COASTAL COMMISSION

12

COASTAL COMMISSION
7575 METROPOLITAN DR. Stn 103
SAN DIEGO , CA 92108

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Mr/Mrs. John and Cynthia MacMillan

Address: 808 Caminito del Mar
Carlsbad, Ca 92011

Dated: 7-07-07

Received
JUL 10 2007
California Coastal Commission
San Diego Coast District

COASTAL COMMISSION
7575 METROPOLITAN DR. Stn 103
SAN DIEGO , CA 92108

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~~Mr~~/Mrs. Margaret May-Martz

Address: 819 Casimiro Rosa
Carlsbad, Ca 92011

Dated: ~~Margo~~ June 5, 2007

Received
JUN 11 2007
California Coastal Commission
San Diego Coast District

COASTAL COMMISSION
7575 METROPOLITAN DR. Stn 103
SAN DIEGO , CA 92108

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Mr/Mrs. Eva B. David

Address: 6514 Camino del Parque
Carlsbad, CA. 92011

Dated: June 7, 2007

RECEIVED
JUN 0 6 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Tom Luster

COASTAL COMMISSION
7575 METROPOLITAN DR. Stn 103
SAN DIEGO , CA 92108

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Mr/Mrs. Stephen D. Pryce

Address: 807 Camerito Rosa
Carlsbad, CA. 92011

Dated: 6-2-07

RECEIVED
JUN 0 5 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

COASTAL COMMISSION
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SAN DIEGO , CA 92108

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Mr/Mrs. MATTHEW J. PALLAMARY

Address: 6462 CAMINO DEL PARQUE

CARLSBAD, CA 92011

Dated: 6-1-07

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JUN 0 5 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

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JUN 20 2007
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

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Mr/Mrs. Ms MAUREEN GOGGIN (Maureen Goggin)

Address: 822 CAMINITO Del SOL

CARLSBAD CA 92011

Dated: 6-1-07

HERITAGE RANCH
MANAGEMENT INC.
– Avocado & Citrus Grove Care –

July 3, 2007

Commissioner Pat Kruer, Chair
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer,

I recently read an article in the North County Times (*North County farmers bracing for water cutbacks*, June 26, 2007) which has left me feeling deeply troubled at the precarious situation of San Diego's farmers due to the recent water shortage and proposed reductions in water deliveries to farmers.

As an independent farmer, water is one of my biggest business expenses. A sharp increase in costs or a decline in available supplies would greatly impact my livelihood and the continued vitality of our industry. There are already so many variables in the farming business, an affordable and reliable water supply should not be one of them.

Fortunately, there is an environmentally sound, cost-effective solution to my and other farmers' water concerns: the Carlsbad Desalination project. The project would greatly ease the burden on San Diego's hardworking farmers and ensure the survival of San Diego's agricultural industry. I ask you to please approve this project and ensure that San Diego's water supply remains steady and affordable for farmers.

Sincerely,

Burnet Wohlford
President

Enclosure

cc: Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

P.O. Box 301680 Escondido, CA 92030 PH 760-745-1524 FX 760-738-8745

cc:

Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
Commissioner Steve Kinsey
Commissioner Brooks Firestone
Commissioner Suja Lowenthal
Commissioner Lorena Gonzalez
Mr. Peter Douglas
Mr. Tom Luster
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Senate President Pro Tem Don Perata
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Senator Dennis Hollingsworth
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Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

THE CALIFORNIAN
NC TIMES NET
AN EDITION OF NORTH COUNTY TIMES
NORTH COUNTY TIMES

June 26, 2007

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By: QUINN EASTMAN - Staff Writer

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June 20, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

My name is Mrs. Helen Owens, 6502 Camino del Parque, Carlsbad CA, 92011 a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey my support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. I have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future if steps are not taken to meet the needs of our current and future population. I am pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

I believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

I hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mrs. Helen M. Owens,

Helen M. Owens.

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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Commissioner Brooks Firestone
Commissioner Trent Orr
Mr. Peter Douglas
Mr. Tom Luster
Governor Arnold Schwarzenegger
Speaker Fabian Nunez
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Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June 20, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

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Dear Commission Members:

My name is Mrs. Dorothy R. Thomas, 6772 Camino del Prado, Carlsbad CA, 92011 a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey my support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

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Mrs. Dorothy R. Thomas

Dorothy R Thomas

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Commissioner Ben Hueso
Commissioner Steve Bland

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Senator Denise Ducheny
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Commissioner Michael Genest
Commissioner Cindy Aronberg
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Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June18, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

My name is Mrs. Dee Osargent, 826 Caminito Rosa, Carlsbad CA, 92011 a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey my support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. I have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future if steps are not taken to meet the needs of our current and future population. I am pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

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I hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mrs. Dee Osargent,

DEE OSARGENT

Ccs: Chairman Pat Kruer
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Commissioner Steve Bland

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Senator Christine Kehoe
Senator Denise Ducheny
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Ms. Susan Young
Ms. Jessica Jones

June 18, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have also received a copy of this letter.

Dear Members of the Commission:

My name is Jean Delmar, President of the Board of Altamira #1, HOA and I have been authorized by the Board to offer our unconditional support of the above captioned project.

Carlsbad is a beautiful place to live, in part due to the proximity to the Carlsbad coast. Any threat to the pristine condition of the coast and to its many recreational uses is a direct threat to the homeowners association and our quality of life. We feel that the Desalination Plant will be no such threat.

We are alarmed about the growing number of reports about the impact global warming will have on our water supply. The fact that our region is almost 100% dependent on imported water could spell disaster for the future if steps are not taken to meet the needs of our current and future population. We are pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until the declining water supply problem grows to crisis proportions.

After studying the project and its environmental reports, we believe that the desalination project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents. We would like to applaud the City of Carlsbad and Poseidon resources for working together to make this happen.

We hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Jean F. Delmar

Jean F. Delmar,
For Altamira #1 HOA

cc Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Bland
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Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

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June 10, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

My name is Jan Stovall, 812 Caminito del Reposo, Carlsbad CA, 92011 a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey my support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. I have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future if steps are not taken to meet the needs of our current and future population. I am pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

I believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

I hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Ms. Jan Stovall, 6410 Camino del Parque, Carlsbad, CA 92011-2463.

Jan Stovall

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland

Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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Commissioner John Chiang
Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June 6, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

Our names are Mr. & Mrs.Robert Hl Hafslund, 6529 Camino del Parque, Carlsbad CA, 92011-2466, residents of Altamira #1 HOA, located in Carlsbad California and we are writing this letter to convey our support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. We have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future, if steps are not taken to meet the needs of our current and future population. We are pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

We believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

We hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mr. & Mrs. Robert H. Hafslund

R J Hafslund

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland

Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

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Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June 6, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

My name is Mrs. Ida Weaver, 820 Caminito Verde, Carlsbad CA, 92011, I am a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey my support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. I have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future, if steps are not taken to meet the needs of our current and future population. I am pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

I believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

I hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mrs. Ida Weaver, IDA. H. WEAVER.

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

Commissioner Steve Kram
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Ms. Jessica Jones

June 6, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

Our names are Mr. & Mrs. John Scurlock, 6557 Camino del Parque, Carlsbad CA, 92011 residents of Altamira #1 HOA, located in Carlsbad California and we are writing this letter to convey our support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. We have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future, if steps are not taken to meet the needs of our current and future population. We are pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

We believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

We hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mr. & Mrs. C. Scurlock,

Carol + John Scurlock

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

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Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June 2, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

Our names are Mr. & Mrs. Eugene and Betty R. Kofler, 817 Caminito del Reposo, Carlsbad CA, 92011 residents of Altamira #1 HOA, located in Carlsbad California and we are writing this letter to convey our support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. We have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future if steps are not taken to meet the needs of our current and future population. We are pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

We believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

We hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mr. & Mrs. Eugene Kofler

Eugene R Kofler + Betty

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

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Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June 6, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

My name is Mrs. Jean Boyle, 6501 Camino del Parque, Carlsbad CA, 92011, a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey our support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. I have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future, if steps are not taken to meet the needs of our current and future population. We are pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

I believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

I hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mrs. Jean Boyle

Ella Jean Boyle

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland

Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

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Ms. Susan Young
Ms. Jessica Jones

June 2, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

My name is Myrtle M. Thompson, a resident of Altamira #1 HOA, located in Carlsbad California and I am writing this letter to convey my support for the Carlsbad Desalination Project to be build here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. I have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future if steps are not taken to meet the needs of our current and future population. I am pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

I believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

I hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mrs. Myrtle M. Thompson, 6410 Camino del Parque, Carlsbad, CA 92011-2463

Myrtle M. Thompson

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

Commissioner Steve Kram
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Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

June1, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Franciso, CA 94105

Subject: Carlsbad Desalination Project

Coastal Commission staff have already received a copy of this letter.

Dear Commission Members:

Our names are Margaret & Mayo Stillman, 819 Caminito Verde, Carlsbad CA, 92011 residents of Altamira #1 HOA, located in Carlsbad California and we are writing this letter to convey our support for the Carlsbad Desalination Project to be built here in Carlsbad by Poseidon Resources.

Carlsbad is a beautiful place to live, due in part to the proximity to the Carlsbad Coast. We have been alarmed over the growing number of reports about global warming and the impact it will have on our water supply. The fact that our region is almost 100% dependant on imported water could spell disaster for the future, if steps are not taken to meet the needs of our current and future population. We are pleased to see that the City of Carlsbad is proactive in addressing this issue instead of waiting until a declining water supply grows to crisis proportions.

We believe this project will bring high quality, reliable water to our city with no real environmental impact to the ocean or project site. The desalination plant is necessary to secure a future water supply for Carlsbad residents.

We hope that you and your fellow Commissioners share our urgency and concern about our water supply and quality of life for the California coastal residents. Please approve this project as soon as possible.

Mr. & Mrs. M. Stillman,

Margaret & Mayo Stillman

Ccs: Chairman Pat Kruer
Vice Chairwoman Bonny Neely
Commissioner Ben Hueso
Commissioner Steve Bland
Senator Mark Wyland
Senator Christine Kehoe
Senator Denise Ducheny
Senator Bob Margett

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Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
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Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

RECEIVED
JUN 15 2007
CALIFORNIA
COASTAL COMMISSION

HAROLD REAGLE
6731 RUSSELIA CT.
CARLSBAD, CA 92011

June 11, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Carlsbad Desalination Project

****Coastal Commission staff have also received a copy of this letter****

Dear Members of the Commission:

My name is Harold Reagle and I am an active member of the Alta Mira 4 HOA in Carlsbad. I have kept informed about the progress of this project since it was first announced and I fully support it.

My interest in water stems from a personal experience. Thanks to a German submarine we went for 39 days with no consistent water supply. We survived by collecting rainwater when it was available. This gave us enough water for limited drinking only. None for things like brushing your teeth, showers, cooking (including coffee), or washing clothes. Try that for just a day and you will realize how important a viable, proven source of water is to your life.

I urge the Commission to expedite the approval process and do whatever you can to speed completion of this project.

Sincerely,

Harold Reagle

Harold Reagle

cc: (see over)

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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Commissioner Michael Genest
Commissioner Cindy Aronberg
Commissioner Anne Sheehan
Mr. Paul Thayer
Ms. Barbara Dugal
Ms. Judy Brown
Ms. Susan Young
Ms. Jessica Jones

RECEIVED

JUN 1 5 2007

CALIFORNIA
COASTAL COMMISSION

JAMES G COLCLASER

1049 GOLDENEYE VIEW

CARLSBAD, CA 92011-1225

760 431-5052

June 11, 2007

California Coastal Commission

45 Fremont Street, Suite 2000

San Francisco, CA 94105

Subject: Carlsbad Desalination Project

****Coastal Commission staff have also received a copy of this letter****

Dear Members of the Commission:

My name is Jim Colclaser and I am President of the Carlsbad Seabright HOA. I also arrange informational programs for the Southwest Carlsbad Homeowners Association Coalition.

I have followed the progress of establishing a desalination plant in Carlsbad for some time. I have toured the pilot facility, drunk the water, attended and participated in many meetings, and met the members of the team selected to build the plant. It is obvious that Poseidon Resources has gone the extra mile to be sure this plant meets all requirements and will be a dependable source of potable water.

A review of the Environmental Impact Report shows the positive results of diligent work by Poseidon, the Carlsbad City Staff and highly regarded engineers and scientists to eliminate or materially reduce any impact on the coastal environment.

Having a reliable source of water is extremely important to Carlsbad, San Diego County and , in fact, to all of California, so any negatives must be weighed against the benefits.

I believe the Commission should approve this project and seek ways to speed up its completion.

Jim Colclaser

Jim Colclaser

jimc6854@juno.com

cc: (see over)

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
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RECEIVED
JUN 1 5 2007
CALIFORNIA
COASTAL COMMISSION

HAROLD REAGLE
6731 RUSSELIA CT.
CARLSBAD, CA 92011

June 11, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Carlsbad Desalination Project

****Coastal Commission staff have also received a copy of this letter****

Dear Members of the Commission:

My name is Harold Reagle and I am an active member of the Alta Mira 4 HOA in Carlsbad. I have kept informed about the progress of this project since it was first announced and I fully support it.

My interest in water stems from a personal experience. Thanks to a German submarine we went for 39 days with no consistent water supply. We survived by collecting rainwater when it was available. This gave us enough water for limited drinking only. None for things like brushing your teeth, showers, cooking (including coffee), or washing clothes. Try that for just a day and you will realize how important a viable, proven source of water is to your life.

I urge the Commission to expedite the approval process and do whatever you can to speed completion of this project.

Sincerely,

Harold Reagle

Harold Reagle

cc: (see over)

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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CALIFORNIA
COASTAL COMMISSION

JAMES G COLCLASER

1049 GOLDENEYE VIEW

CARLSBAD, CA 92011-1225

760 431-5052

June 11, 2007

California Coastal Commission

45 Fremont Street, Suite 2000

San Francisco, CA 94105

Subject: Carlsbad Desalination Project

****Coastal Commission staff have also received a copy of this letter****

Dear Members of the Commission:

My name is Jim Colclaser and I am President of the Carlsbad Seabright HOA. I also arrange informational programs for the Southwest Carlsbad Homeowners Association Coalition.

I have followed the progress of establishing a desalination plant in Carlsbad for some time. I have toured the pilot facility, drunk the water, attended and participated in many meetings, and met the members of the team selected to build the plant. It is obvious that Poseidon Resources has gone the extra mile to be sure this plant meets all requirements and will be a dependable source of potable water.

A review of the Environmental Impact Report shows the positive results of diligent work by Poseidon, the Carlsbad City Staff and highly regarded engineers and scientists to eliminate or materially reduce any impact on the coastal environment.

Having a reliable source of water is extremely important to Carlsbad, San Diego County and , in fact, to all of California, so any negatives must be weighed against the benefits.

I believe the Commission should approve this project and seek ways to speed up its completion.

Jim Colclaser

jimc6854@juno.com

cc: (see over)

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Ben Hueso
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
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REWATER
SYSTEMS, INC.

P.O. Box 210171
Chula Vista, CA 91921
Phone/Fax (619) 421-9121
www.rewater.com

June 4, 2007

Tom Luster
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Dear Mr. Luster:

In this era of prolonged drought and man-made climate change especially affecting the fast-growing West, the federal, state, and local governments are now preparing to spend hundreds of billions of dollars over the next few years on new water sources, wastewater treatment facilities, urban run-off pollution prevention, and power production plants, all of which greywater irrigation systems directly and substantially reduce the need for. The Green Building industry has already proven it.

The Green Building industry is an incubator for ideas, a proving ground for techniques, and a springboard for new industries. For example, they were the first to offer solar panels on homes. When it comes to water, wastewater, run-off pollution, and energy, nothing impacts all of it more than new housing, and nothing decreases that impact more than green building.

Homes that adhere to green building standards promoted by the Leaders in Energy and Environmental Design (LEED) program and similar types of programs reduce their negative impacts by about 50%. That's a lot of rivers and their flora and fauna not lost to water transfers, or fish to desalination, a lot of sewage not dumped into rivers and oceans, a lot of hydro-carbons not burned and unceremoniously scattered into the breeze for downwind neighbors to choke on. From an environmental perspective, that's a quantum leap better than the status quo for construction.

Traditional wisdom says that making things environmentally better should translate into a lot more cost, but the exact opposite is true in the case of greywater irrigation systems. Here in Southern California, where most of the state's new residential construction is happening, ornamental irrigation consumes over half of all water used there. Well over half of all water used there comes from elsewhere, causing significant impacts at the source, and expensive mitigation, and requiring a tremendous amount of energy to lift that water out of the ocean and through pumps or over mountain ranges and the hundreds of miles it must travel. Once in the cities, and used, that water must then be expensively treated as sewage, requiring even more pumping and energy, and chemical treatment. Not so with greywater irrigation.

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JUN 11 2007
CALIFORNIA
COASTAL COMMISSION

A greywater irrigation system reuses the home's good water – showers, tubs, bathroom sinks and laundry water – onsite, and then only has to pump it several feet out to the landscape, where it seeps into the soil via drip irrigation, with controllers, valves, tubing, and emitters, something people are investing in anyway.

This irrigation process keeps half the home's wastewater from entering the sewage stream, keeps all irrigation water from running off with the pollutants it finds along the way, and substantially reduces supply side and downstream energy demand. Compared to solar panels, which have had decades of R&D, subsidies, and market time, the ROI for a greywater irrigation system is already three times faster. With greywater irrigation systems becoming mainstream, economy of scale will make them equivalent to personal computers for water.

Traditional water projects, desalination, for instance, only increase upstream, onsite, and downstream environmental problems and costs. Greywater irrigation eliminates or reduces all of those problems and costs, thus greywater irrigation is the only method with virtually total public support.

There is a lot of speculation money being spent on desalination, but that does not make desalination the best idea. Not at all.

I hope you will encourage the Commission to pick the low-hanging fruit first.

Sincerely,

Stephen Wm. Bilson
Chairman & CEO
cell (619) 322-0141

The world's most efficient irrigation system

Enjoy a beautiful,
care-free landscape
while saving your money

ReWater
SYSTEMS, INC.

Your beautiful home deserves a beautiful landscape. A landscape maintained by the world's most efficient and cost-effective irrigation system.

ReWater® irrigation systems are designed for the discriminating western home-buyer, yet over time cost less than conventional irrigation systems. And they provide all the benefits of the very best conventional systems, while offering additional advantages.

Our state approved systems capture and filter about 50% of all the water you use inside your home, year after year. No more worry about constantly rising water rates, future droughts, or the inevitable irrigation moratoriums which will come.

Your water is applied right to the roots of only the plants you want to irrigate. Not a drop is wasted. With ReWater Systems' patented and time-tested subsurface emitters, you will have no more broken or fouled sprinkler heads, or unsightly black drip tubes laying around. No more spotted windows or mildewed foliage. All that you, your neighbors, and your friends will see is your beautiful landscape.

What you won't see is how it works. Our system uses the most intelligent controller ever designed. It directs an automatic filter to clean itself. It precisely distributes water around your yard, responsive to the soil's moisture requirements. It even shuts down in the rain. Our controller will also supplement your irrigation program with new water if there is not enough used water on hand.

Imagine taking long, guilt-free showers knowing the water going down the drain will eventually satisfy your thirsty landscape.

Homeowners have been enjoying ReWater benefits since 1990—now you can too.

ReWater Systems. Bringing you closer to a beautiful world.

- *The only irrigation system that pays for itself*
- *Save thousands of dollars over the life of your home*
- *Reuse about 50% of the water from inside your home*
- *Avoid broken or fouled sprinklers*
- *Stop costly evaporation loss*
- *Reduce new weed infestations by up to 80%*

Easy installation during construction

Much more!

"We at ReWater Systems are proud to offer the world's most efficient irrigation systems. You are going to irrigate, so why not enjoy a beautiful, care-free landscape that doesn't cost a fortune to maintain."

Steve Bilson
Chairman and Chief Executive Officer

Why Choose a ReWater Irrigation System?

1. Reuse about 50% of the water from inside your home

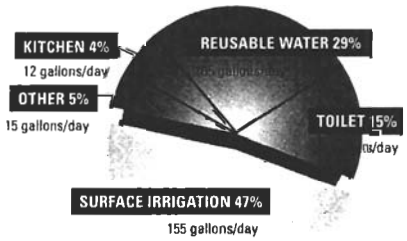
Over the life of your home, this huge savings pays for the system and then provides a substantial profit. The more water rates rise, and they are continually rising, the more you save.

Save Thousands of $$$ Over the Life of Your Home!!

To Find Out How Much You Can Save, See the Savings Chart in Back.

2. Stop Evaporation Loss

Up to 60% of all irrigation water can be lost to evaporation—it is the single largest waste of water at your home. Subsurface irrigation completely eliminates evaporation. This process keeps water at the root zones, and off windows, sidewalks, leaves, or other unwanted places.



Spray irrigation consumes about 47% of all your water.

3. Reduce Damage/Increase Aesthetics

Because most of the irrigation network is buried underground, there is far less chance of damage from being kicked, driven over, frozen, etc. With no unsightly tubing on the surface, there is nothing for animals to chew on, or for maintenance workers to snag or cut. This means less maintenance and expense to you over the years.

4. The Best Controller Available

Our controllers are unique to the irrigation industry. Not only do they include all the best functions found in conventional controllers for surface use, they enable you to reuse your water with our patented system's subsurface emitters.

5. Reduce New Weed Infestations

By keeping water subsurface, weed seeds blown in on the breeze do not find damp top soil on which to germinate. This reduces the spread of new weeds by up to 80%, drastically reducing your cost for landscape maintenance.

6. Consistent Irrigation Is Better

The standard method of irrigation is to soak and then dry an area repeatedly. Irrigation experts now agree that plants grow better when you provide a constant moisture level in the soil, which is what the ReWater System does automatically.

7. Leach Field Life Extension

If your home uses private wastewater disposal/leach fields, you may know that repairs to such fields are invasive and expensive. These fields are designed to dissipate the entire wastewater flow. When using a ReWater System, you reduce that flow by half, doubling your leach field life expectancy.

Compare a ReWater System to any other irrigation system – on their terms –

✓ Price

✓ Efficiency

✓ Maintenance

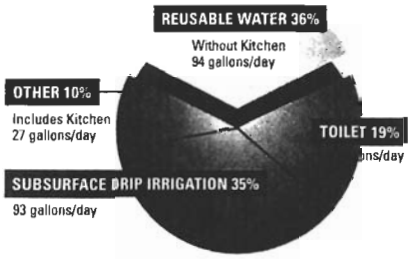
Then, look at our advantages!

8. Free Fertilizer

When liquid laundry detergents and hydrogen peroxide bleach are used, you eliminate most salt and chloride from the water, rendering it a liquid fertilizer. The system can even be used to inject a fertilizer supplement right into the root zones of the plants, minimizing fertilizer waste, cost, and application time.

9. Drought Proofing

When the next drought hits, homeowners with a ReWater System can continue their regular watering schedules despite inevitable irrigation moratoriums. This system may be the only thing that saves your expensive landscape.



Reusable water equals typical subsurface drip irrigation required.

10. Erosion Control

Typical surface irrigation systems water your plants by saturating the top soil. Surface moisture creates superficial root systems that fail to hold the soil in place, and can even fail to hold the plant in the soil. The ReWater system applies water subsurface, encouraging your plant's roots to travel deeper into the soil. This creates a network of reinforcing roots, which helps prevent erosion.

HOW THE REWATER SYSTEM WORKS

The home is pre-plumbed so the ReWater System can be easily installed when needed. Plumbing is designed so selected shower, tub, and clothes washer water flows to a sealed filtering tank instead of the main waste line. The tank has an overflow line with backflow protection, connected to the main wasteline, so the plumbing is failsafe.

When the tank fills with water, a switch turns the pump on, which sends water through a self-cleaning filter to remove unwanted particles such as hair and lint. This simultaneously pressurizes the irrigation network and irrigation begins, with the controller distributing water to multiple irrigation valves as programmed. If no one is home producing reusable water, or if an insufficient quantity is produced for the program, potable water is added automatically.

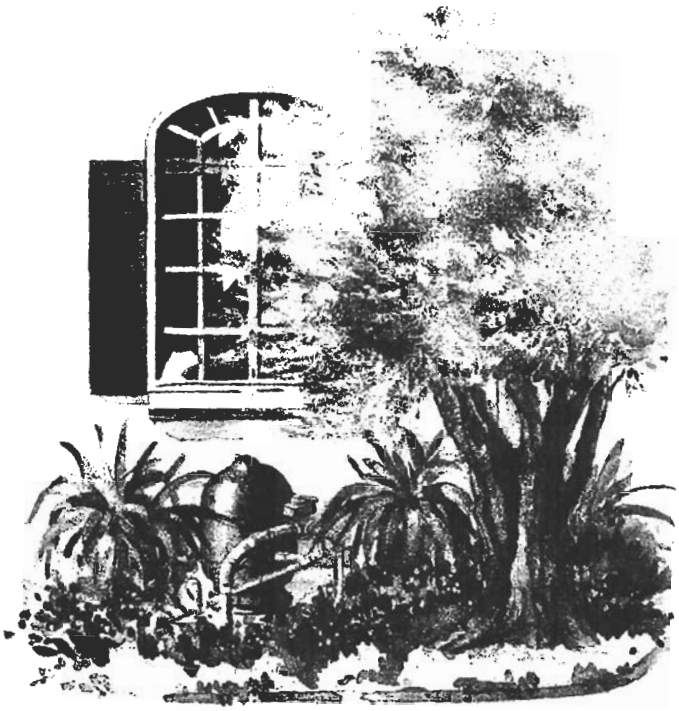
For areas to be irrigated with reusable water, water is applied subsurface through a network of subsurface drip emitters designed especially for this system (U.S. Patent # 5,217,323). Due to their large passageways, our emitters do not clog from the post-filter organic solids found in reusable water. And their unique air-gap design defeats root intrusion, without the use of chemicals. For areas such as blue grass lawns or other short-rooted ground covers that cannot reach the 9" depth required for reused water, our controller can utilize any method of surface irrigation.

Reusing water for irrigation makes perfect sense!

What Does a ReWater System Include?

A standard ReWater System comes with a collection/filtration unit, a state-of-the-art controller with surface and subsurface capability, and a complete subsurface irrigation network for a typical two-person home. For homes plumbed to accommodate more people, or where a larger landscape requires more irrigation capacity, simply install additional irrigation network. Once homes have been pre-plumbed for a ReWater System, final installation is easy and can be performed by any qualified landscape contractor.

ReWater Systems come with a warranty covering all parts and workmanship for two years.



Where Do I Go From Here?

Our architectural and landscaping experts are available to help you.

Simply call us [redacted] and we'll gladly discuss how you can enjoy a ReWater System in your new home.

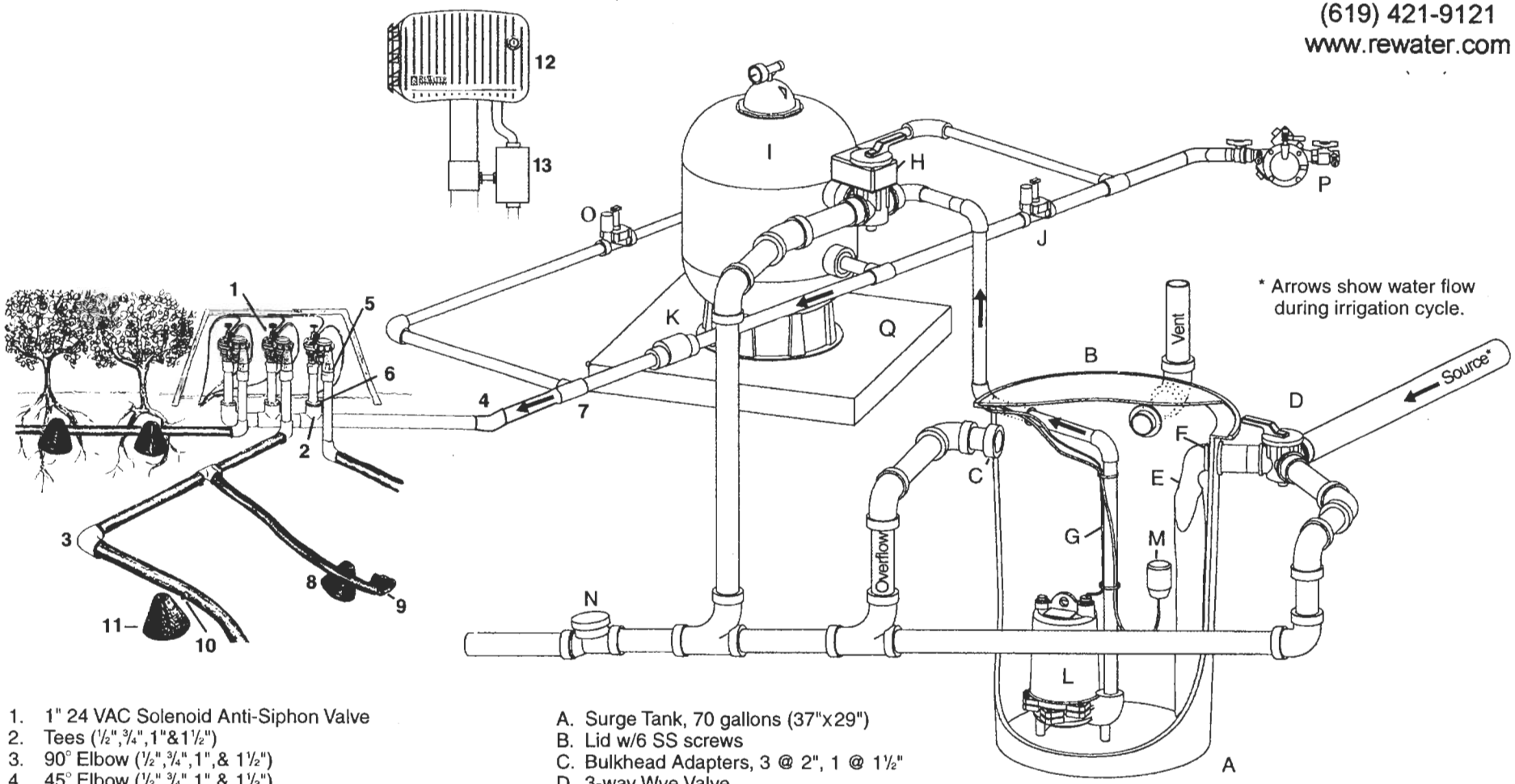
Management Team of ReWater Systems

Michael Brown	*Stephen Bilson*	*Gary Rossi*	*Scott Atkinson*
VP of Marketing	*CEO*	*Director of Sales*	*VP of Finance*

ReWater Systems, Inc.
P.O. Box 210171
Chula Vista, CA 91921
(619) 421-9121
www.rewater.com

The ReWater® Irrigation System & Automatic Filter

REWATER SYSTEMS, INC.
(619) 421-9121
www.rewater.com



* Arrows show water flow during irrigation cycle.

1. 1" 24 VAC Solenoid Anti-Siphon Valve
2. Tees (½",¾",1"&1½")
3. 90° Elbow (½",¾",1",& 1½")
4. 45° Elbow (½",¾",1",& 1½")
5. 1" Threaded Male Adapter
6. Slip Reducers (½"x ¾", ¾"x 1", & 1"x1½")
7. Reducing Tees (1½" x 1½" x 1")
8. Polyethylene Tubing (½",¾", & 1")
9. Polyethylene Tubing Ends (½",¾", & 1")
10. 1/8" Double Barb Connectors
11. Emitter & Emitter Screens
12. Controller
13. Relay Junction box

NS Hole Punch (not shown)
NS 1" End of line Flush Caps (not shown)
NS Couplings (½",¾", 1",& 1½") (not shown)

A. Surge Tank, 70 gallons (37"x29")
B. Lid w/6 SS screws
C. Bulkhead Adapters, 3 @ 2", 1 @ 1½"
D. 3-way Wye Valve
E. Hair Filter Bag, stiff polyester weave
F. SS Clamp for filter bag
G. 1½" discharge pipe
H. 3-way Tee valve with 24 VAC Actuator
I. Filter Vessel with PVC pipe adapters
J. 1½" Solenoid Valve for backwash
K. 1½" PVC swing check valve
L. Pump, ME50S-11 if standard.
M. Float Switch
N. Backflow valve with viewing port
O. 1" Solenoid Valve for irrigation supplement
P. Reverse Pressure Principle device
Q. Platform (optional)

Warranty:
ReWater Systems Inc. warranties the ReWater System to be free of manufacturing defects for two years on the entire system, and ten years on the filter vessel and collection tank.

REWATER SYSTEMS, INC.

ReWater Systems, Inc
P.O. Box 210171
Chula Vista, CA 91921
(619) 421-9121
www.rewater.com

Plumbing

Drain connections to tank:
All regularly used showers
Clothes washer
Other showers, tubs, bathroom sinks
Model # RWAF2 has 2" fittings, for ≤ 4 drains
Model # RWAF3 has 3" fittings, for ≤ 17 drains

Diverter valve on source pipe:
Same size as source pipe

Overflow from tank to main wasteline:
Goes to tank and waistline with backflow device

Vent on tank:
1½" if 2" source, 2" if 3" source

Fresh water:
1" w/ ≥ 50 psi*
Reverse Pressure Principle device, ≥ 1"
Connect to filter backwash valve
Supplemental irrigation valve needs 1"
*requires anthracite filter media.

Electrical

110 VAC Power:
13.5 amps to controller, grounded
16/3 from controller to pump
18/2 double shielded w/drain wire to float switch

24 VAC from controller:
18/3 to 3-way valve at filter vessel
18/2 to irrigation supplement valve
18/2 for up to 20 irrigation valves

Pump and 3-way valve Relay Panel:
½" conduit to irrigation controller

110 VAC shall be in approved housings.

24 VAC wire connections shall be in water-proof nuts.

Irrigation

Emitters:
320 minimum for first drain source
160 minimum for each extra drain
95 maximum per 1" valve
Spacing is ≥14" On Center

Valves:
1" Anti-siphon
Wire Bundles to controller

Tubing:
1" main lines
¾" laterals
½" branches

See Owner's Manual for design criteria.

One Year's Worth Of Savings For The Western US
Due To All New Residences in the West Reusing Their Own Water

BASIC ASSUMPTIONS:
Home starts obtained from Construction Industry Research Reports and US Census Bureau
Average 2006 water and wastewater rates

Number of New Systems	513,000	Water Rate in Area (per Water Unit)	$2.16
Number of People per Residence	3.2	Annual Increase in Water Rates in Area	7.0%
Years on Mortgage/Life of System	30	Home Surface Irrigation Requirement (gals/year, 30% evap loss)	250,000
Mortgage Rate	4.9%		

Annual Water Savings		**Water Savings over Life of Mortgage**	
Evaporated Water Saved at 30% efficiency increase (in Water Units)	*51,437,166*	Present Discounted Value	$8,405,793,312
Water Reused (in Water Units)	*42,579,000*	Cash Amount Over Life of Mortgage	$20,525,399,595
Evaporation Savings at 30% efficiency increase	$111,104,278		
Value of Reused Water	$91,970,640		
Total Annual Water Savings	$203,074,918		
		Drought Replanting/Rate Spike Savings	
		Present Discounted Value	$0
		Cash Amount Over Life of Mortgage	$0
Annual Rebates		**Ongoing Rebates over Life of Mortgage**	
Sewer treatment costs (SRF is funded with this, see Upfront Reductions	$0	Present Discounted Value	$2,134,582,185
	$0	Cash Amount Over Life of Mortgage	$4,118,364,000
Value of NPS pollution offset (annual interest savings on mitigation land	$137,278,800		
Total Annual Rebates	$137,278,800	**Upfront Reductions**	
		Sewer connection fee (-25%)	$384,750,000
		Local Water District connection fee reduction	$384,750,000
		Regional conservation reduction ($390 @)	$200,070,000
		EPA State Revolving Fund	$1,457,946,000
(Include rebates for all homes)		Total Upfront Rebates	$2,427,516,000
Total Annual Savings	$340,353,718	**Total Savings**	
		Present Discounted Value	$12,967,691,497
		Cash Amount Over Life of Mortgage	$27,071,279,595
Annual Costs per ReWater System Filtration Unit		**Total Annual Costs over Life of Mortgage**	
Fresh Water for Filter Auto Cleaning	-$10	Present Discounted Value	-$530,715,123
Amortized O&M	-$6		
Electricity	-$20	Cash Amount Over Life of Mortgage	-$1,127,984,806
Annual RPA inspection	-$15		
Annual Costs per Unit	-$51	**Upfront Costs per ReWater System Filtration Unit**	
		ReWater System Filter Unit	-$3,299
Total Annual Costs	-$25,978,812	Additional Plumbing	-$400
		Upfront Costs per Unit	-$3,699
		Irrigation System is from builder's existing budget, ReWater product	$0
		Lawn Installation Cost Differential of drip v. sprinklers	-$500
		Total Upfront Costs	-$1,897,587,500
Net Annual Savings per Home	$396	Net Savings per Home	
		Present Discounted Value	$20,545
		Cash Amount Over Life of Mortgage	$46,873
Net Annual Savings for All Homes	$203,074,867	Net Savings for All Homes	
		Present Discounted Value	$10,539,588,874
		Cash Amount Over Life of Mortgage	$24,045,707,289

AGUA HEDIONDA LAGOON FOUNDATION

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CALIFORNIA
COASTAL COMMISSION

March 28, 2007

California Coastal Commission Board
Chairman Pat Kruer
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Please note that Coastal Commission staff has also received a copy of this letter.

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer and Commission Members:

I am writing on behalf of the Agua Hedionda Lagoon Foundation in support of the Carlsbad desalination plant. The Foundation's purpose is to conserve, restore and enhance the environmental features of the Agua Hedionda Lagoon, marsh, wetlands and watershed area, to protect sensitive land through acquisition or other means and to promote balanced recreational and commercial uses consistent with assured future lagoon vitality. The Foundation serves as an advocate for the lagoon and is a strong supporter of public access, trails and recreational opportunities.

The Lagoon provides a wide range of beneficial uses. Nearly all of these uses are directly or indirectly affected by seawater flow and exchange created by the periodic dredging of the Lagoon by the Encina Power Plant. The water circulation directly, and positively, affects the Lagoon's ability to sustain and propagate marine life and support water related activities, such as marine research, aquaculture, fishing and water contact recreation.

In reviewing the proposed desalination plant, the Lagoon Foundation has been particularly mindful of salinity and toxicity impacts as well as potential entrainment and impingement impacts. Our support for the project is based on the conclusion that the desalination plant will not have significant salinity-related impacts to marine life off shore or entrainment and impingement impacts to marine life in the lagoon.

The plant's certified Environmental Impact Report specifically studied a 'no power plant' scenario, which demonstrates that the desalination plant can be operated in an environmentally responsible manner regardless of whether or not the Encina Power Station is fully functioning. This conclusion is of critical importance to the Lagoon Foundation because of recent news media reports that the power plant might one day be decommissioned or switch to an alternative means of cooling. In case the power plant ever does stop running, Poseidon Resources, as the operator of the desalination

plant, assumes responsibility for dredging the lagoon. Consequently, the operation of the desalination plant is critical to the long-term health of the lagoon's marine ecosystem.

In closing, we have given considerable consideration to the City of Carlsbad's and Poseidon Resources' desalination project and find it includes the design, environmental protections and mitigation necessary to sustain the Agua Hedionda Lagoon for generations to come. In the absence of the power plant, the Foundation believes the desalination project is absolutely critical to maintaining the health of the Agua Hedionda Lagoon. We urge you to expeditiously approve Poseidon Resources permit application.

Respectfully,

Eric Munoz

Eric Munoz, President
Agua Hedionda Lagoon Foundation

Vice Chairwoman Bonnie Neely
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
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Ms. Jessica Jones

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COASTAL COMMISSION

CARLSBAD AQUAFARM
4600 Carlsbad Boulevard
Carlsbad, CA 92008

Note: A copy of this letter has been sent to Coastal Commission staff.

March 28, 2007

California Coastal Commission Members
45 Fremont Street, Suite 2000
San Francisco, CA 94105

To: All Coastal Commission members and staff

My name is Andrew Davis and I am the vice president of Carlsbad Aquafarm, located at 4600 Carlsbad Blvd.; Carlsbad, CA 92008. Our family-run business is located on the Agua Hedionda Lagoon and employs 20 workers and produces 1 million oysters, 300,000 to 400,000 pounds of mussels, 50,000 pounds of seaweed and 12,000 seahorses annually. Attached is a recent news article in the *San Diego Business Journal* about our business.

Aquaculture is a growing industry in the United States, generating about $1 billion in annual sales. I believe that aquaculture is the future of our seafood industry and should be promoted locally. However, $11 billion of seafood - over 70 percent of our nation's supply - is still being imported.

The growth of aquafarms, like ours, is important to the economy and the environment. Not only do they help bridge a multibillion-dollar trade deficit with foreign fish distributors, they relieve the pressure that overfishing can put on the environment with minimal impact on the marine ecology.

Our business in particular is heavily dependent upon clean water and beaches. That is why, when the EIR for the Carlsbad Desalination Plant was circulated, I paid close attention to Section 4.7 on Hydrology and Water Quality. I was most concerned about entrainment and impingement, and increased salinity in the plant's discharge that could have an adverse impact on ocean water quality. But after careful review, I am satisfied that Poseidon Resources has designed a project that will minimize impacts and has more than adequate mitigation measures in place to protect marine life in the lagoon. This last point is essential if the power plant ceases to operate in the future. In this case, the desalination plant then provides the lagoon with a new steward that has a shared interest in the Lagoon's long-term vitality.

Finally, this project will benefit the City of Carlsbad, all of its residents and future Grunion runs by continuing the existing practice of placing clean, high-quality sand on Carlsbad State Beach that has been supported by the Coastal Commission in the past as an environmentally beneficial practice. It also ensures a reliable supply of high quality seawater for our business which depends upon ultra-clean water to depurate our shellfish of such impurities as sand and bacteria after harvesting.

Please consider this letter to be our endorsement of the Carlsbad Desalination Plant project. I hope you will approve the project in short order.

Thank you,

Andrew Davis

cc.
Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
Commissioner Steve Blank
Commissioner Steve Kram
Commissioner Khatchik Achadjian
Commissioner Sara Wan
Commissioner Mary Shallenberger
Commissioner Mike Reilly
Commissioner Larry Clark
Commissioner William Burke
Commissioner Dave Potter
Commissioner Judy Biviano Lloyd
Commissioner April Vargas
Commissioner Dan Secord
Commissioner Adi Liberman
Commissioner Sharon Wright
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Ms. Barbara Dugal
Ms. Judy Brown
Ms. Jessica Jones

SAN DIEGO BUSINESS JOURNAL on the web

Aquafarming Could Slow the Flood of Imported Seafood

SeaWorld's Research Efforts Seek to Replenish Supplies From Fished-Out Oceans, Decrease Imports

2/26/2007

By JESSICA LONG
SAN DIEGO BUSINESS JOURNAL STAFF

One fish, two fish, red fish, blue fish … farm fish?

Carlsbad aquafarmers, who use science to breed commercial seafood supplies, are fighting to grow their industry at home.

They're doing so despite competition from importers who are used to gorging on U.S. dollars and opposition from animal welfare activists.

According to the U.S. Department of Agriculture, 70 percent of seafood consumed domestically each year is imported.

About half of all imports are "aquafarmed," said Donald Kent, president and chief executive officer of the Hubbs-SeaWorld Research Institute.

The value to importers is $11 billion. In comparison, the United States' aquaculture industry generates about $1 billion in sales, Kent said, so the gap is enormous.

The Hubbs-SeaWorld Research Institute is an independent, not-for-profit, 501(c)(3) public benefit corporation. SeaWorld is among its funding sources.

The institute operates a 20,000-square-foot white sea bass hatchery in Carlsbad that plans to release as many as 350,000 farm-grown bass back into the Pacific Ocean this year.

The operation, which employs 20 and costs $1.3 million a year to run, is designed to replenish oceanic supplies depleted by human encroachment. The program has been under way for 12 years.

Kent said that while the United States imports $11 billion in seafood each year, the nation exports just $3 billion, creating an "unacceptable" $8 billion trade deficit.

"We import so much but most of it is aquacultured, which means we're paying someone else to grow it for us when we know we could be growing it ourselves," Kent said.

Kent's group regularly drops its "crop" into the ocean from 14 staggered sites from Santa Barbara to San Diego.

Kent, who says aquaculture is about "farming the sea instead of harvesting it," said it used to cost $5 per released fish but refinements to the process with trial and error have brought that down to $2.

He said if the institute could operate as a for-profit business that amount could probably be further reduced.

While Kent's group releases fish for other for-profit fishermen to catch, nearby business Carlsbad Aquafarm Inc. profits.

Family-run since 1990, Carlsbad Aquafarm annually produces 1 million oysters, 300,000 to 400,000 pounds of mussels, 50,000 pounds of seaweed and 12,000 seahorses. The mussels and oysters are sold for human consumption, while the seaweed and seahorses are sold to home aquarium owners.

"The bread and butter of what we do are the mussels and the oysters that we grow here," said Andrew Davis, vice president of the business that employs about 20 on a 10-acre site. Davis did not disclose revenues or profits.

"It'll be difficult with the price of labor," Davis said. "We're not millionaires by any stretch. I mean, we are farmers but we make a living at it."

'Diving' Deeper

In addition to sea bass in Carlsbad, the institute's aquaculture program, which is funded by grants, has a staff of 10 that work out of the group's Mission Bay offices to identify native species appropriate for farming.

Both Davis and Kent, who started with the institute in 1977 as a graduate student, welcome industry regulation to help boost its credibility, though both say they are already monitored by the state Department of Fish and Game.

"Aquaculture is the future and should be promoted locally," Davis said. "I think all seafood that you and I will eat in the next 10 years will be aquacultured."

Ironically, regulations imposed decades ago to protect dolphins helped decimate San Diego's tuna fishing industry. Senior Research Biologist Mark Drawbridge, who heads up the institute's aquaculture program, believes that tuna fishing could be revived with farming techniques.

"There's a thriving tuna (farm) industry right across the border," Drawbridge said. "We're just looking at that thing thinking, 'jeez, there's just no reason that can't be moved up to Southern California.' "

California Watersports
4215 Harrison St
Carlsbad CA 92008
(760) 434-3089
www.carlsbadlagoon.com

This letter has been sent to Coastal Commission staff.

March 28, 2007

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

RE: Carlsbad Desalination Plant

Dear Commission Members,

I am the owner of California Water Sports, located at 4215 Harrison Street in Carlsbad, CA. I am very fortunate to be able to operate in the Agua Hedionda Lagoon, in the inner lagoon at Snug Harbor. Unlike many other lagoons in San Diego County, active recreational water sports are permitted here.

California Water Sports offers expert lessons and rents a variety of boats, including kayaks, canoes and peddle boats, to the general public. My company also hosts Camp H2O Extreme, a summer youth camp for children 7 and older.

Many years ago, the lagoon was a stagnant, salt marsh. When the Encina Power Station came on line, the operators began annual dredging to keep the mouth of the Agua Hedionda lagoon open to the ocean. Millions of gallons of water move through the lagoon and power plant every day. As a result, the lagoon's ecosystem is now a healthy, tidal body, with large wetlands supporting a wide variety of marine life and marine related education, research and recreation opportunities.

The health of the lagoon is an important factor to my business' success. I want to ensure that access to public recreational activities is maintained while the ecological attributes of the lagoon flourish. In this regard, we are concerned about the future of the Agua Hedionda Lagoon now that it has been suggested that NRG Energy might no longer rely on the lagoon to cool its power plant.

I firmly believe that the operation of the Carlsbad desalination plant is necessary to ensure the continued maintenance and support of the lagoon's ecosystem and related beneficial uses historically supported by

the power plant. In fact, in the absence of continued dredging of the lagoon, the opening to the Pacific Ocean will close in a few years and the ability of the lagoon to support these uses will be greatly diminished.

I ask you to approve the Carlsbad Desalination project when it comes before you. Thank you for taking the time to consider what I have expressed to you, and its importance to our continual success on the lagoon.

Sincerely,

Josh Cantor
Owner, California Water Sports

cc.

Chairman Pat Kruer
Vice Chairwoman Bonnie Neely
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Assemblymember Martin Garrick
Assemblymember Lori Saldana
Assemblymember Joel Anderson
Assemblymember Shirley Horton
Assemblymember Mary

BIOCOM

March 9, 2007

Chairman Pat Kruer
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

I am writing to you today on behalf of BIOCOM, a premier life science industry association representing more than 530 member companies in San Diego and Southern California. Our association focuses on initiatives that positively influence the growth of the life science industry, including capital formation, public policy, workforce development, and scientific discovery and development.

In the past few decades, San Diego has become a magnet for biotech businesses because of its high quality of life and the efforts made by local government to foster the growth of this important industry. To ensure the bio technology industry can remain viable, it is imperative that we develop a locally-controlled, reliable supply of high-quality and affordable water.

After reviewing the proposed Carlsbad Seawater Desalination facility plans, BIOCOM believes that the project can be constructed and operated in an environmentally responsible and cost-effective manner. This facility will provide enough water to meet the needs of 300,000 San Diegan annually, while lessening the burden on our regional water supply and our dependence on imported water.

The Carlsbad desalination project will have significant economic benefits for the region, specifically as it relates to the County's emerging high technology and bio-technology cluster that relies on high-quality water for manufacturing.

BIOCOM offers its full support of Poseidon Resources' Desalination Project and we urge the Commission to approve the Coastal Development permit application for this project.

Sincerely,

Joseph D. Panetta
President & CEO
BIOCOM

4510 EXECUTIVE DRIVE, PLAZA ONE, SAN DIEGO, CA 92121 TEL 858 455-0300 FAX 858 455-0022 WWW.BIOCOM.ORG

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COASTAL COMMISSION

January 25, 2007

Mr. Patrick Kruer, Chairman
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Coastal Commission staff has received a copy of this communication

RE: Carlsbad Desalination Project – Coastal Development Permit Application No. E-06-013

Dear Chairman Kruer:

The members of the San Diego County Farm Bureau understand that a reliable local water supply is crucial to the survival of our industry. That is why we have offered our full support to the City of Carlsbad and Poseidon Resources' desalination facility.

San Diego County is the 12th largest farm economy among all counties in the nation and our local agriculture industry ranks as the fifth largest industry in the county, contributing more than $1.5 billion to the local economy and sustaining more than 5,000 farmers. For the San Diego farming community, an environmentally responsible and affordable water supply is critical to the preservation of our open space and agricultural land.

Due to San Diego's excessive dependence on imported water supplies, our region endures water prices that are among the highest in the nation. For many local farmers, the cost of water can adversely impact their daily operations. With the heavy demand and lack of supply of water in this region, we feel it is imperative that San Diego develop new supplies to meet this demand and escalating costs.

The Farm Bureau is committed to water recycling and water conservation best management practices, but these approaches alone won't be able to sustain the farming industry. By relieving the pressure on existing supplies through desalination, San Diego's farm economy will be able to flourish for years to come.

It is apparent to the Farm Bureau that the cost of importing water to this region will only continue to escalate and desalinated water has become an affordable alternative source of reliable high-quality water. Additionally, the proposed desalination project is consistent with Governor Schwarzenegger's overall goals to improve water supply reliability through investments in infrastructure capable of producing new water supplies.