



VALLEY CENTER WATER DISTRICT

A Public Agency Organized July 12, 1954

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January 23, 2009

Chair Richard Wright and Regional Board Members
San Diego Regional Water Quality Control Board
San Diego – Region 9
9174 Sky Park Court, Suite 100
San Diego, CA 92123

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SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

RE: Carlsbad Desalination Project (#R9-2008-0039)
Approval of Marine Life Mitigation Plan, February 11 2009 Hearing

Dear Chairman Wright and Board members:

I represent Valley Center Municipal Water District, the largest agricultural water district in San Diego County. We serve 25,000 residents and 24,000 acres of agricultural land within the unincorporated communities of Valley Center, Jesmond Dene, Hidden Meadows, Circle R and the Lawrence Welk Village.

On behalf of the District, I have recently reviewed the Marine Life Mitigation Plan for the Carlsbad Desalination project and I wish to submit my comments and offer my endorsement of the plan.

As the agency that oversees water quality in our region, you are well aware of the current constraints upon our water system. We are dealing with drought, legal challenges that restrict pumping in the Sacramento-San Joaquin Bay Delta, and longstanding infrastructure issues that are just now beginning to receive adequate attention from our state government. Combined, these challenges make it difficult for water districts to plan for and meet the needs of residents and businesses without initiating mandatory water rationing.

Although we emphasize education, conservation and reclamation, many of our customers are agricultural users that have already reduced their water usage substantially to accommodate MWD's diminished deliveries and are now in jeopardy of losing their livelihood.

The District foresaw these increasing strains on our water system and signed a long-term water purchase agreement with Poseidon Resources in 2005 to provide 7,500 acre-feet of water annually. We know that desalination will diversify our water supplies and make our district less susceptible to emergencies and shortages.

This project has already been scrutinized and accepted by numerous state agencies over the past ten years and has long since proven it's an environmentally-responsible project. Your Board has already approved the waste discharge permit and the Flow, Entrainment and Impingement Minimization Plan. The new Marine Life Mitigation Plan (MLMP) provides further evidence that Poseidon Resources takes its responsibilities to our marine environment seriously and has made numerous binding commitments to that effect.

The interagency approval process of the MLMP, which involved eight state agencies including Regional Board staff, Coastal Commission and State Lands Commission staff and the Department of Fish and Game, culminated in approval by the Coastal Commission in Aug. 2008 of a performance-based MLMP with 11 pre-approved candidate mitigation sites. It's important to note that the Regional Board staff participated in the review of the mitigation plan but never expressed concerns or objected to the final plan that was approved by the Coastal Commission.

Valley Center Municipal Water District understands that seawater desalination is a key part of the solution to the region's long-term water reliability needs. The entire San Diego region is depending on this new water supply to lessen the demand on imported water. We find no reason to delay action any longer and we strongly urge the Board to approve this project.

Thank you,



Gary Arant
General Manager

cc:

David King, Vice Chairman
Eric Anderson, Board Member
Grant Destache, Board Member
George Loveland, Board Member
Wayne Rayfield, Board Member
Gary Thompson, Board Member
Kris Weber, Board Member
John Robertus, Executive Director
Catherine Hagan, Regional Board Attorney