



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

July 27th, 2007

State Water Resources Control Board
Division of Water Quality
1001 I Street
Sacramento, CA 95814



Attn: Song Her, Clerk of the Board, Executive Office

Re: **Support for Item 10, Alternative 1, No Action**, California Ocean Plan Amendment

On behalf of the Industrial Environmental Association, I am writing you regarding the Ocean Plan Amendment, "Issue 10. Desalination Facilities and Brine Disposal." After reviewing the proposed amendment, We urge that you select, Alternative 1, No Action, in determining the future of the existing Ocean Plan.

A reliable and cost-effective water supply is critical to maintaining and expanding California's manufacturing, technology and growing biotechnology industry sectors.

Further, ocean water desalination is a recognized part of California's future water portfolio. Our ability to utilize new water supplies for urban use through desalination will provide much needed security for our drinking water supply and will safeguard our natural resources. For these reasons, the development of a new source of water is an urgent necessity.

In order to provide the water community an opportunity to research and review the potential of ocean water desalination, we ask that Alternative 1. No Action, be selected by the Board to prevent any artificial standard (percentage of natural background) from impeding the continued design of desalination plants where feasible and appropriate to meet the needs of our current and future generations.

The scoping document, Amendment of The Water Quality Control Plan, Ocean Water of California, June 2007, Issue 10 states that, "Currently, there is no Ocean Plan objective that applies specifically to brine water discharges from desalination plants or groundwater desalination facilities." This conclusion is without merit, as the current Ocean Plan is protective of marine resources with respect to brine discharges without additional limits set at this time.

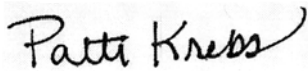


The Ocean Plan already provides significant safeguards to ensure the protection of marine species and plants through toxicity testing on sensitive life stages of marine species.

In conclusion, IEA supports the increased development of ocean water desalination in California. Recognizing that much work lies ahead, the water industry has initiated additional site-specific research on hyper salinity effects and will continue to do so as new sites are proposed. As this process continues, good public policy would suggest we get more data and experience before we begin to amend the Ocean Plan.

For these reasons, we recommend that the Board select Alternative No Action. Thank you for your consideration.

Sincerely,

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

Patti Krebs
Executive Director