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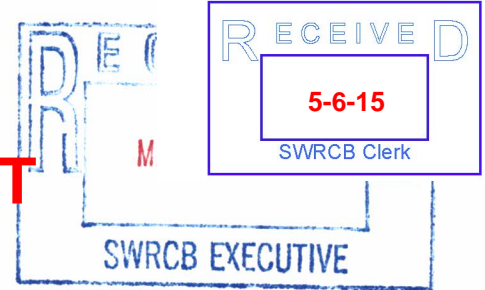
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# Assembly California Legislature



LUIS A. ALEJO  
ASSEMBLYMEMBER, THIRTIETH DISTRICT

COMMITTEES  
CHAIR: ENVIRONMENTAL SAFETY AND  
TOXIC MATERIALS  
LOCAL GOVERNMENT  
JUDICIARY  
LABOR AND EMPLOYMENT



**LATE COMMENT**

Thomas Howard  
Executive Director  
California Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

RE: Comments on the State Water Resources Control Board proposed Amendments to the Water Quality Control Plan for Ocean Waters of California (the "California Ocean Plan") Addressing Desalination Facility Intakes and Brine Discharges

Dear Mr. Howard:

The State Water Resources Control Board (State Water Board) is currently considering the adoption of the proposed Final Amendments to the Water Quality Control Plan for the Ocean Waters of California addressing Desalination Facility Intakes, and Brine Discharges.

Representing the people and communities of Monterey County, I have serious concerns about the delivery of safe and affordable drinking water in many communities on California's Central Coast. The current drought throughout California has highlighted the need for new water sources. The State Water Resources Control Board has an obligation of establishing standards and criteria that will provide the flexible and efficient rules for desalination facilities. California must seek out multiple water supply sources to meet its future needs.

I am very concerned that the proposed Amendments, including the proposal released on May 4th raise serious questions about the restrictive language and limited allowable technology prescribed by the State Water Board. I would suggest that the amendments should consider both surface and subsurface intakes equally, depending on the site's location, topography, and specific impacts. The Amendments favor subsurface intakes over surface intakes as the preferred technology for seawater intakes for all new or expanded desalination facilities.

Predetermined standards for facility operations are clearly not based on a sound scientific review of projects nor are they authorized or envisioned by the Water Code. The explicit requirement for a subsurface intake is a single criteria preference that trumps a thorough analysis under the California Environmental Quality Act. Desalination projects will have numerous impact considerations that must be considered with a series of project alternatives. The feasibility standards in the proposed desalination amendments provide useful policy guidance for analyzing subsurface intake alternatives in comparison to other types of ocean intakes.



My communities, including Salinas, are challenged for a replacement water supply and will be directly impacted by the shortcomings of the current recommended Ocean Policy. The Monterey Bay region including Santa Cruz and Monterey Counties need a regional solution for a sustainable source of potable water. Your review of the proposal and an appreciation for the people and communities in need of safe and affordable drinking water is greatly appreciated.

Sincerely,



Luis A. Alejo  
Assemblymember, 30 Assembly District

CC: Robert Egel, State Water Board  
Jeanine Townsend, Clerk to the Board