



San Diego County Water Authority

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April 6, 2005

Mr. Eric L. Gillies, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

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RE: Comments on Draft Environmental Impact Report for Disposition of Offshore Cooling Water Conduits, SONGS Unit 1 (SCH 2004061092)

Dear Mr. Gillies:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the project titled "Disposition of Offshore Cooling Water Conduits, SONGS Unit 1." As stated in both written and oral comments submitted at the scoping meeting on July 1, 2004, the San Diego County Water Authority (Water Authority) is very interested in preserving the conduits for potential use as part of a proposed regional seawater desalination facility that would be located at or near the San Onofre Nuclear Generating Station (SONGS).

Formed in 1944, the Water Authority is a regional water wholesaler charged by the California Legislature with the responsibility to "provide each of its member agencies with adequate supplies of water to meet their expanding and increasing needs." The Water Authority serves 23 member agencies consisting of cities, water districts, utility districts and a military reservation, Camp Pendleton. Seawater desalination will play an important role in our region's future and is key to the Water Authority's on-going effort to diversify the county's water supply and enhance water reliability. By 2020, we estimate that between 6 and 15 percent of our water supply will come from the Pacific Ocean. Currently, the Water Authority is conducting environmental, planning and feasibility studies for desalination facilities at several coastal locations in San Diego County, including the Encina Power Station, the San Onofre Nuclear Generating Station, and various sites in southern San Diego County.

OTHER REPRESENTATIVE

County of San Diego

We appreciate the report's recognition in "Section 2.3.11 – Potential Future Reuse of Conduits," of planning efforts by the Water Authority and the Municipal Water District of Orange County (MWDOC) regarding the development of a regional seawater desalination facility at MCB Camp Pendleton that would utilize the existing intake and discharge conduits. We also appreciate the report's recognition of the value of a regional seawater desalination facility, and its capability to serve the Water Authority, MWDOC as well as MCB Camp Pendleton.

3.5.1

A public agency providing a safe and reliable water supply to the San Diego region

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3.5.2 { The Water Authority has completed the Pre-feasibility Level Assessment/Fatal Flaw Analysis Study, which identified no fatal flaws with respect to locating a 50 to 100-mgd regional seawater desalination facility at or near SONGS. Both MCB Camp Pendleton and Southern California Edison (SCE) have concurred that additional study is warranted. The Water Authority is currently preparing the scope of work for a detailed feasibility study and anticipates proceeding with this next phase by summer 2005.

3.5.3 { While the Proposed Project would technically allow the conduits to remain in place for future use, the practical use of the conduits would be lost over time as the conduits filled in with sand and sediment. In addition, plugging the onshore portions of the conduits with concrete would effectively render them unusable without significant reconstruction.

3.5.4 { Unlike the Proposed Project, the Artificial Reef Alternative does not require plugging of the conduits, nor the complete removal of the risers, thereby allowing for preservation of the tunnels for future use as intake and/or discharge facilities. We therefore strongly recommend the adoption of this alternative as the preferred project in the FEIR. This alternative fully preserves the conduits for reuse as intake and discharge infrastructure for the proposed seawater desalination facility. In fact, the report describes the Artificial Reef Alternative as the Environmentally Superior Alternative among the other alternatives, as it would:

- Not require dredging or beach disturbance;
- Have a shorter duration than any of the other build alternatives;
- Provide a long-term benefit for commercial fishing by creating an artificial reef;
- Remove the marker buoys that are currently obstacles to marine transportation and fishing, and most importantly;
- Retain the conduits in a state that would be most suitable for future reuse.

3.5.5 { We further recommend that should the Artificial Reef Alternative be selected, the dismantled sections of the terminal structures be relocated to another artificial or natural reef structure away from the existing conduits.

3.5.6 { The Water Authority supports Commission adoption of the Artificial Reef Alternative, as modified above. We look forward to working with you to preserve these unique facilities for future public benefit. If you have any questions, please call Bob Yamada, Seawater Desalination Program Manager at (858) 522-6744 or e-mail at ryamada@sdewa.org.

Sincerely,



Ken Weinberg
Director of Water Resources

cc: Ed Rogers, MCB Camp Pendleton
Karl Seckel, MWDOC
Dave Brevig, Southern California Edison

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1 **3.5 San Diego County Water Authority, April 6, 2005**

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3 3.5.1 Comment noted.

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5 3.5.2 Comment noted.

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7 3.5.3 Comment noted.

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9 3.5.4 Support for the Artificial Reef Alternative is acknowledged.

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11 3.5.5 Comment noted.

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13 3.5.6 See Response 3.5.4.

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