



Santa Ana Watershed Project Authority

MEMBERS OF THE PROJECT AUTHORITY

EASTERN MUNICIPAL WATER DISTRICT
INLAND EMPIRE UTILITIES AGENCY
ORANGE COUNTY WATER DISTRICT
SAN BERNARDINO VALLEY MUNICIPAL WATER DISTRICT
WESTERN MUNICIPAL WATER DISTRICT

July 26, 2007

Honorable Tam Doduc, Chair
and Members of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



ATTENTION: Ms. Song Her, Clerk of the Board

6/26/07 Scoping Mtg.
CA Ocean Plan Amend.
Deadline: 7/27/07 Noon

Dear Chair Doduc and Members of the Board

RE: California Ocean Plan Amendments

The Santa Ana Watershed Project Authority (SAWPA) is pleased to provide comments on the proposed amendments to the California Ocean Plan (COP). **Our comments focus on Issue 10, *Desalination Facilities and Brine Disposal*, indicating our support for Alternative 1.**

SAWPA owns, operates and maintains much of a 93-mile pipeline in the Santa Ana Watershed referred to as the Santa Ana Regional Interceptor (SARI). The SARI System was first envisioned in the early 1970's as a way to remove salt from the watershed and to collect and transport non-reclaimable industrial brine that could not be effectively treated at local treatment facilities. The SARI line stretches from the City of San Bernardino extending through the Prado Basin and then connects downstream to Orange County Sanitation District (OCSD) treatment facilities located in Huntington Beach. An additional leg of the SARI System was constructed approximately five years ago up the Temescal Canyon allowing high saline waters to be transported out of Eastern Municipal Water District. SARI flows are piped under Prado Dam through Orange County to merge with wastewater at the OCSD Plant No. 2 for secondary treatment and then ultimately discharged to the ocean.

Since its construction, the SARI System plays a vital role in the overall salt management of the watershed. Multiple desalination facilities have been constructed throughout the watershed which desalt brackish groundwater and utilize the SARI line for brine disposal. These desalination facilities are operated by several SAWPA member agencies such as: Western Municipal Water District (WMWD), Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), as well as their sub-agencies. Region 8 RWQCB has recognized the importance of the desalination facilities and brine line as stated in Chapter 7 of their Basin Plan, "SAWPA plays a crucial role in the watershed in the implementation of the Basin Plan through construction of physical facilities which are key parts of the Basin Plan's strategy to address salt problems in the upper Santa Ana Basin."



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Since over 70% of the water supply within the Santa Ana Watershed comes from groundwater basins often impacted from salt deposition from past agricultural practices and other sources, SAWPA anticipates that the amount of brine generated will significantly increase as more desalination plants are constructed. Over the next 20 years, plans are underway to add an additional 20 MGD of desalination in WMWD, 8 MGD in EMWD, 20 MGD in IEUA, and 12 MGD in the San Bernardino Valley. Each desalter will depend on the use of the SARI line to meet its brine disposal needs.

Additionally, as the more and more emphasis is placed on alternative water supplies to meet water demands, the use of recycled water will be key to future regional water needs. In order to utilize recycled water and meet wastewater management requirements defined in the RWQCB Basin Plan, recycled water must meet basin plan objectives and discharge permit requirements. Desalination and the transport of brine out of the watershed helps remove TDS and nitrate from source water which in turn allows recycled water to be applied without impairing groundwater quality. The RWQCB Basin Plan has stated in Chapter 5 IV.B that "discharges of brines and other mineralized wastewaters to the SARI and the Chino Basin Non-Reclaimable Line are encouraged."

In review of Alternatives 2 and 3 of proposed amendments to the California Ocean Plan Amendment Issue 10, *Desalination Facilities and Brine Disposal*, concern is raised that these policies could hinder or obstruct the development and implementation of important water recycling and desalination programs in our watershed, which are critical to creating and maintaining a sustainable water supply. The continued success of these programs is even more critical in light of the current and future droughts, pressures on the Colorado River supply, and anticipated additional shut downs of the California Water Project now and in the coming years.

While it is acknowledged that the SWRCB must protect the quality of the State's waters and beneficial uses of those waters, SAWPA believes that the California Ocean Plan, as currently written, has sufficient provisions to provide for that protection in the case of brine disposal to the ocean. This has been demonstrated by the proactive implementation by OCSD to expand their wastewater treatment standards for ocean outfall from primary to secondary treatment levels and meet all Region 8 RWQCB ocean discharge permit requirements that are protective of the marine environment.

In summary, SAWPA appreciates the opportunity to provide comments and strongly urges the SWRCB to select **Alternative 1: No Action on Issue 10 – Desalination Facilities and Brine Disposal**. Alternative 1 will allow safe disposal of brine without impeding the significant progress that our member agencies and their sub-agencies have made working

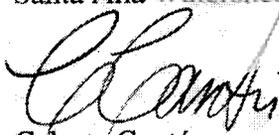
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closely with the Region 8 RWQCB in seeking to achieve salt management and protecting water quality for water supply and ecosystem needs in the Santa Ana Watershed.

Thank you for your consideration

Sincerely,

Santa Ana Watershed Project Authority



Celeste Cantú
General Manager

CC:MN:pb

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