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Tuesday, August 19, 2014

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Proposed Desalination Amendment and Staff Report

Heal the Ocean (HTO), a Santa Barbara based citizens' action group focused on stopping sources of ocean pollution, appreciates this opportunity to offer input on the State Water Resources Control Board's (SWRCB) "**Proposed Desalination Amendment and Staff Report.**" As a part of the Santa Barbara County Integrated Water Management (IRWM) Steering Committee we have worked in cooperation with water and wastewater districts to develop grant applications for projects that address the region's water needs - with our organization focusing on recycled water projects as an excellent opportunity to both address water supply and ocean pollution issues.

Heal the Ocean has become involved in the issue of seawater desalination due to local concerns that restarting Santa Barbara's mothballed seawater desalination plant could lead to significant environmental impacts, energy use and potential significant ratepayer hikes. HTO has collaborated with the City in independent studies, and also financed engineering and cost feasibility studies, for the purpose of assisting the community in coming up with fair and reasonable responses to various ocean/water issues.

And in response to concerns about desalination in Santa Barbara, HTO is investigating the possibility of developing a cost feasibility study for the expansion of Santa Barbara's current recycled facility (now being refurbished with microfiltration technology) to an indirect potable reuse (IPR) recycled water facility that fully allocates Santa Barbara's approximately 7.8 MGD of wastewater supplies. We believe IPR offers a more environmentally friendly and cheaper alternative with no potential marine life impacts and reduced energy needs while providing a significant potential supply of water through groundwater recharge to the City.

Need for Additional Analysis of Impacts to Recycled Water Use

While Heal the Ocean will not attempt to comment on all aspects or the scope of the "Proposed Desalination Amendment and Staff Report" ("Report") we submit that the Report does not include sufficient analysis of the negative effects on the development of potential statewide recycled water supplies in that comingling wastewater with brine discharge as a means of brine

disposal will reserve wastewater – as wastewater. This could have an impact on the development of statewide recycled water supplies, and the State's recycled water goals.

Chapter 11 of the Report – "The Need to Develop and Use Recycled Water" – states that the “proposed Desalination Amendment is not expected to impact or increase the need for water cycling.”¹ Unfortunately, an expansion of desalination, and associated brine discharge via comingling with wastewater supplies, *would* have an impact on future recycled water use across the state.

The State's recycled water goals aim for 1.5 million AFY of production by 2020, and approximately 2.5 million AFY by 2030. Heal the Ocean's own research found that coastal cities and wastewater districts discharged approximately 1.5 million AFY in 2005.² This ocean discharge represents a significant amount of the 2020 and 2030 goals, even when considering the approximate 670,000 AFY of recycled water produced statewide in 2009. The Report maintains that the “availability of this wastewater for recycling does not require that it be recycled,”³ and it may be true that there is no requirement for any recycling at all, but in order to meet the state's recycled water goals, a significant amount of wastewater discharged to the ocean will have to be converted to recycled water. Allocating a growing amount of wastewater supplies for comingling with wastewater could increasingly jeopardize the State's recycled water goals.

We find erroneous the statement that the “proposed [amendment] language emphasizes that the wastewater for brine dilution is water that would otherwise be discharged into the ocean and is not of either suitable quality or quantity for domestic or irrigation purposes.” This is incorrect! Virtually all wastewater can be reused for water recycling in either potable or non-potable applications through the use of appropriate treatment technologies.⁴ Communities that opt to construct desalination plants that comeingle wastewater with brine discharge will eliminate or reduce their ability to develop recycled water supplies in the future.

The staff report should make explicit that comingling for brine discharge will affect the availability of wastewater for recycled water supplies, potentially limiting the ability to meet State recycled water goals, and limiting communities' options for developing future recycled water supplies.

Non-Substantive Comments

Page 113: The 2009 survey of State recycled water use should be edited to make clear that recycled water use increased by 144,000 AFY *between* 2001 and 2009. The current language

¹ State Water Resources Control Board. *Draft Staff Report: Proposed Amendments to the Water Quality Control Plan for Ocean Waters of California Addressing Desalination Facility Intakes, Brine Discharges, and the Incorporation of other Nonsubstantive Changes*. July 2014: p. 113.

<http://www.swrcb.ca.gov/water_issues/programs/ocean/desalination/docs/draft_desal_sed_070314.pdf>.

² Heal the Ocean. *California Ocean Wastewater Discharge Report and Inventory*. March 2010: p. 5.

<http://healtheocean.org/images/ugc/uploads/press/HTO_COWDI_1.pdf>.

³ State Water Resources Control Board. *Draft Staff Report: Proposed Amendments to the Water Quality Control Plan for Ocean Waters of California Addressing Desalination Facility Intakes, Brine Discharges, and the Incorporation of other Nonsubstantive Changes*. July 2014: p. 113.

⁴ *Ibid.*, p. 114.

states that overall recycled water use in 2001 was 144,000 AFY, while the actual recorded level in 2001 was 525,000 AFY.

Suggested language:

"The survey indicated that eight to ten percent of municipal wastewater is recycled in reuse projects and that recycled municipal wastewater increased ~~from~~ **by** approximately 144,000 acre-feet ~~in between~~ **to** 2009, to over 669,000 acre-feet in 2009."

Conclusion

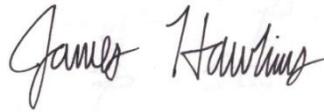
We believe the State should be encouraging recycled water as a sustainable alternative to desalination whenever possible. A water system that discharges significant quantities of treated wastewater into the ocean to only turn around and treat that ocean water is nonsensical. Instead, we should eliminate discharges, replace those discharges with water recycling, and avoid the associated environmental impacts of desalination.

While desalination may be inevitable for some communities, the purpose of the Staff Report is to lay out the facts, and HTO requests that the Report include the impact of desalination on future statewide recycled water supplies and the State's recycled water goals.

Sincerely,



Hillary Hauser, Executive Director



James Hawkins, Policy Analyst