From: Stephanie Pacheco
To: opc.comments@scc.ca.gov
Subject: Protect our Ocean - to John Laird, Secretary for Natural Resources
Date: Sunday, September 04, 2011 5:20:09 PM

Please support groups such as the Sierra Club, Coastkeeper and Surfrider with their ideas on further protecting our oceans. Of special concern in the policy for desalination below.

The Sierra Club notes:

"In regards to Desalination, we are supportive of your existing policy on no open-ocean intakes and co-location of facilities using Once-Through Cooling, but we see the need for policies on "in-plant dilution" and analyze the impacts of desalinization".

> "The Ocean Plan protects water quality by setting water quality standards in an outfall zone. Recently, Regional Water Boards have allowed the Carlsbad and Huntington Beach desalination facilities to meet these standards by taking-in additional seawater to dilute the brine waste before discharging the mixture to the ocean. In-plant dilution with seawater not only undermines the Once-through Cooling Policy, but is illegal under the Porter-Cologne Act.
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> Water Code Section 13142.5 requires desalination facilities to use the best-available technology to minimize the mortality of marine life. Killing fish to dilute brine does not equate to the Best-Available Technology. Various other technologies exist to dilute brine, including: (1) high pressure diffusers; (2) Zero Desalination Discharge technologies that remove brine contaminants; and (3) dilution with recycled water or wastewater discharges.

9. The OPC should also work with DWR and the State Water Board to critically analyze the impacts of ocean desalination to marine ecosystems versus other water supply strategies, including water conservation, recycling, and stormwater recharge.

   This should include GHG emissions impacts. Work has already begun on this, and has shown that the enormous GHG emission loading associated with ocean desalination already makes it one of the most problematic water supply strategies from a long list of potential options.

10. OPC should study and report on the cumulative impacts of current, proposed and potential desalination facilities.

    This cumulative impacts study should include the impacts from increased energy

demand, greenhouse gas emissions, discharges of brine (including acidification), impingement and entrainment, salt water intrusion into local aquifers, and other cumulative coastal and marine ecosystem impacts. The OPC should then ensure that the study's results are transmitted to the appropriate agencies, and should advocate for their inclusion in relevant policies, permits and planning documents.

This is important because private industry and water agencies are planning over 20 open ocean desalination facilities statewide, an increase in capacity from 1,700 AFY to over 300,000 AFY. This is an increase of over 18,000% in desalination capacity. Left unchecked, the cumulative impacts of multiple open ocean desalination facilities could effectively undermine the gains to the marine environment from implementing the OPC's resolution on OTC and your efforts to find adaptation strategies for imminent climate change and sea level rise."

Protect our coasts. Thank you.

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