

**CALIFORNIA COASTAL COMMISSION**

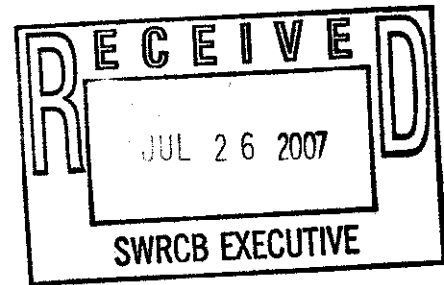
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6/26/07 Scoping Mtg.  
CA Ocean Plan Amend.  
Deadline: 7/27/07 Noon



July 26, 2007

Song Her, Clerk to the Board  
Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



VIA EMAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov).

RE: Comment Letter – California Ocean Plan Amendment

Dear Ms. Her:

Thank you for the opportunity to comment on the proposed amendments to the California Ocean Plan. We have reviewed the Board's July 2007 Scoping Document and look forward to continued involvement in the Board's review process. At this time, however, we have comments on just Issue 10 of the Scoping Document, which addresses proposed changes for desalination discharges.

Issue 10 includes three alternatives being considered to address adverse effects caused by discharges from desalination facilities to the ocean. The three alternatives are:

- 1) No Action – this would result in no salinity standard being added to the Ocean Plan.
- 2) Establish a narrative water quality objective based on a percentage of natural background levels.
- 3) Establish a numeric water quality objective – the preliminary level being considered is 36.5 g/kg, based on a 1992 sea urchin embryo study.

We believe that the best option of these alternatives is Alternative 2. We recommend that the narrative water quality objective be established based on the existing natural conditions in California's nearshore waters. The state's nearshore ocean waters have an average salinity level of about 33.5 g/kg, which varies by  $\pm 10\%$  due to natural phenomena such as freshwater inputs, upwellings, etc. Establishing a narrative water quality objective that allows discharges of no more than 10% above ambient salinity levels would ensure that discharges stay within a range already experienced by the nearshore ecosystem, which would likely minimize the adverse impacts of those discharges. We note, too, that a 10% increase of the 33.5 g/kg average salinity level would be 36.85 g/kg, which is almost the same as the 36.5 g/kg limit proposed in Alternative 3.

We also recommend, however, that the Board conduct additional research into known or likely effects of these discharges on marine life. One of the difficulties the Coastal Commission has experienced in reviewing proposed desalination discharges is that there are very few scientific studies that describe the acute or chronic effects of higher salinity levels on organisms found in California's nearshore waters and no studies of the long-term ecosystem effects of such

discharges. It would be helpful for the Board to conduct such studies both to confirm the existing information and to provide new information more applicable to California's ocean waters.

Again, we recommend a narrative standard allowing no more than 10% above ambient salinity levels and we also recommend additional acute and chronic tests to further ensure this would be a safe level to allow all beneficial uses.

Thank you again for the opportunity to comment.

Sincerely,

Tom Luster  
Energy, Ocean Resources, and Federal Consistency Division