

California Regional Water Quality Control Board
San Diego Region

Response to Comments Report

Tentative Order No. R9-2024-0005
Amending

Order No. R9-2022-0005
NPDES No. CA0107417

Waste Discharge Requirements and
National Pollutant Discharge Elimination System Permit for the
South Orange County Wastewater Authority
Discharge to the Pacific Ocean
Through The San Juan Creek Ocean Outfall

February 14, 2024



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INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) responses to the written comments received from the South Orange County Wastewater Authority (SOCWA or Discharger), South Coast Water District (SCWD), and Les Miklosy, P.E. on Tentative Order No. R9-2024-0005, amending Order No. R9-2022-0005, NPDES No. CA0107417, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the South Orange County Wastewater Authority Discharge to the Pacific Ocean Through The San Juan Creek Ocean Outfall (Tentative Order).

Comments and Responses

The San Diego Water Board responses to written comments received are set forth below.

Comments from SOCWA and SCWD, letter dated December 7, 2023

SOCWA and SCWD support the Tentative Order to extend the deadline.

Section of the Tentative Order: Not Applicable

Response: Comment Noted

Comments from Les Miklosy, P.E., email dated November 15, 2023

Alternative to Desalination

Les Miklosy finds the proposal for South Coast Water District's Doheny Desalination Project to serve Southern California in locations like Doheny State Beach and San Diego a self-serving proposition and marketing campaign. The Aliso Creek Ocean Outfall and the San Juan Creek Ocean Outfall dispose of 3-10 million gallons per day of secondary-treated wastewater that could be recovered for irrigation water after tertiary treatment for less than the cost of desalination. Please consider desalination as a last resort after building more storage capacity and tertiary treatment.

Section of the Tentative Order: Not Applicable

Response

These comments are outside the scope of the Tentative Order and the related Notice of Opportunity to Comment. Order No. R9-2022-0005 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include the type of facilities discharging to or the type of discharges to the San Juan Creek Ocean Outfall. Therefore, the revisions to the type of facilities and wastewater discharged cannot be considered at this time.

In terms of increasing recycled water production or pursuing direct or indirect potable reuse instead of the Doheny Desalination Project, it has long been a policy of the San Diego Water Board to encourage and promote water recycling while taking into

consideration the need to protect beneficial uses of the waters of the State of California and protect the public health. Water recycling should be carefully considered by persons proposing to discharge once-used wastewater to the ocean whenever practical. SOCWA and its member agencies have an extensive history of collaborating to implement water recycling projects that are protective of water quality and help to ensure the sustainability of the water supply. Since the early 1990's, the use of recycled water has played a vital role in increasing the reliability and sustainability of the overall water supply within the SOCWA service area. SOCWA reports that its recycled water program regulated under the San Diego Water Board's Order No. 97-52 produces just under 20,000-acre feet per year (AFY) of recycled water for use within its service area, thereby saving approximately 6.5 billion gallons of domestic water each year that otherwise would be used for those purposes. Future projects are in the planning stages in the SOCWA service area to further maximize water reuse for greater resiliency and sustainability of future drinking water supplies. Examples of such projects include Moulton Niguel Water District's ongoing investigation of the beneficial reuse of recycled water for implementation in a Direct Potable Reuse Project and Santa Margarita Water District's proposed multi-phased San Juan Watershed Project to increase the capture and storage of urban runoff and stormwater, optimize recycled water use, and augment local groundwater supplies.