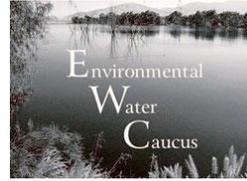
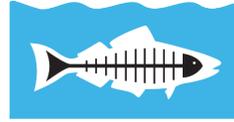
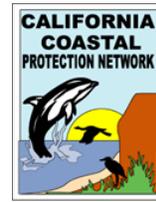




RESIDENTS FOR RESPONSIBLE DESALINATION



Inland Empire WATERKEEPER



Letter to Governor Brown, et al.

Re: Brookfield/Poseidon Huntington Beach Desalination Project – OPPOSE

July 26, 2017

The Honorable Edmund G. Brown
Governor, State of California
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dayna Bochco, Chair
California Coastal Commission
45 Fremont Street #2000
San Francisco, CA 94105

Gavin Newsom, Chair
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

William Ruh, Chair
California Regional Water Quality Control
Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-334

RE: Brookfield/Poseidon Huntington Beach Desalination Project – OPPOSE

Dear Governor Brown and Honorable Chairpersons:

We write in opposition to the Brookfield/Poseidon Huntington Beach seawater desalination facility as currently proposed (Project). Our organizations and our hundreds of thousands of members are dedicated to advancing freshwater sustainability, consumer protection, environmental justice, and coastal and marine conservation in California. Upcoming decisions regarding the Project are of precedential importance as California considers how to make its water supply more safe, resilient, equitable, and cost-effective into our collective long-term future. We oppose the Project as proposed because it is not consistent with these goals, and instead would:

- (1) Impose significant and unnecessary costs on Orange County water districts and ratepayers;
- (2) Set back California's efforts to advance climate-smart water policy;
- (3) Fail to alleviate reliance upon, or impacts to, freshwater ecosystems, including the Bay-Delta; and
- (4) Fail to comply with California law and regulations that govern seawater desalination facilities.¹

We should be clear that we remain open to the use of seawater desalination as a “last resort” element of a well-planned local or regional water supply portfolio that prioritizes investment in multi-benefit, cost-effective, climate-smart supplies. As recently explained

¹ We provide information in support of these arguments in the attached appendix.

by Stanford’s Water in the West Program, sustainable seawater desalination projects are those that “are smaller; that provide supply to meet a specific, clear local demand; that are located away from sensitive and valuable marine areas; and that are powered by renewable energy sources.”² For example, the proposed Monterey Peninsula Water Supply Project,³ which includes a modestly-sized desalination facility as part of a portfolio of investments, follows many of the recommendations our organizations have put forth, such as prioritizing lower-impact water resources, seeking to “right-size” the facility, and using subsurface intakes in order to comply with the State Water Board’s Ocean Plan Desalination Amendment.

By contrast, large-scale seawater desalination facilities in California will have significant economic, energy, and opportunity costs that rarely justify their benefits. It would be far too easy for an expensive and inefficient large-scale facility to become a stranded asset – or, worse, an inescapable long-term liability – for local water districts and communities at the expense of more affordable, resilient, and environmentally sound alternatives.

We also reiterate our support for a rigorous regulatory process that ensures seawater desalination facilities are sited, scaled, and designed to meet demonstrated needs and to incorporate “best available” technologies that avoid or minimize adverse impacts on California’s productive coastal and marine ecosystems. At minimum, proposed facilities must comply with the State Water Resources Control Board’s 2015 regulations governing seawater desalination facilities and brine disposal (“Desalination Policy”). They should also use innovative designs and technologies, such as the use of renewable energy to power 100% of their operations; variable production schedules that allow facilities to take advantage of less expensive electricity rates at certain times of day; and sub-surface intakes to minimize marine life impacts, in contrast to open ocean intakes, the use of which is contrary to long-standing California policy and barred from use in other contexts.

In this case, after reviewing permit application materials and other documents associated with the proposed Project, as well as claims made by the Project’s agents and lobbyists, we believe the Project is not compatible with the common-sense approaches, policies, and regulations that California has established to guide its water investments and, more specifically, to guide the introduction of seawater desalination into the state’s water supply portfolio.

For these reasons, we urge you to deny the Project as proposed pursuant to your respective authorities. California should be showing the United States and the world how it will champion innovative water solutions, rather than enabling the Project’s proponent to lock Californians into long-term dependence on a project that is more costly than the alternatives and based on the use of outdated, harmful, and unsustainable technology.

Sincerely,

² Leon Szeptycki, et al., *Marine and Coastal Impacts of Ocean Desalination in California* (Water in the West, Center for Ocean Solutions, Monterey Bay Aquarium, The Nature Conservancy, May 2016), available at <http://stanford.io/2axdXE7>.

³ See Monterey Peninsula Water Supply Project, <https://www.watersupplyproject.org/>.

Letter to Governor Brown, et al.

Re: Brookfield/Poseidon Huntington Beach Desalination Project – OPPOSE

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