

January 6, 2016

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

Via e-mail to Kathy.Frevert@waterboards.ca.gov

RE: Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation

Dear Chair Marcus and Board Members:

Thank you for the opportunity to comment on the State Water Resources Control Board's (State Board) Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation (Framework). Los Angeles Waterkeeper (LAW) joins in the comments submitted by the California Coastkeeper Alliance, the Pacific Institute, and the Natural Resources Defense Council, and has also submitted a comment letter with several other organizations regarding the Framework's credits for drought-resilient water supplies. We are writing this letter to highlight LAW's specific concerns, particularly with respect to credits for desalination and to urge the State Board not to offer credits for desalination.

LAW is a non-profit environmental organization with over 3,000 members dedicated to protecting and restoring Los Angeles County's waterways. We have been closely following the West Basin Municipal Water District's (District) proposed West Basin Desalination project. The District is moving forward with the project despite the fact that it has not properly evaluated a reasonable range of alternatives, including feasible alternatives such as rainwater harvesting and potable reuse. Furthermore, open ocean desalination raises significant concerns regarding impacts to marine life through impingement and entrainment of organisms at the intakes. Most importantly, desalination of ocean water also has the highest energy demands of all viable methods available to meet water supply needs. Such energy-intensive projects contribute to climate change, which in turn perversely will perpetuate and exacerbate our current and future droughts that desalination purports to address. Supporting such energy-intensive projects also flies directly in the face of California's efforts to be a global leader addressing climate change. Therefore, LAW asks the State Board not to reward these types of expensive investments that have significant, environmental consequences, and urges the State Board to eliminate the provision of credit for desalination.

Finally, I want to stress LAW's support for long-term regulations to improve urban water use efficiency and prevent waste. When such permanent regulations are adopted, we recommend a more equitable method of setting conservation requirements, including aggressive per capita water usage targets (rather than across-the-board percentage reductions) or otherwise penalizing water wasting agencies while taking into account water supplier's prior conservation efforts.

We look forward to working with the State Board members and staff to continue to improve the Framework and to develop solutions to the deepening challenges to long-term water reliability that California faces.

Sincerely,



Bruce Reznik, *Executive Director*