Clerk to the Board
California Coastal Commission
via e-mail at commentletters@waterboards.ca.gov

Subject: Comment Letter – Desalination Amendments

To the Board:

While certainly desalination sounds like a good water alternative given the drought conditions afflicting the state, its execution and the water quality available to SoCal residents as a result need to be thoroughly evaluated and controlled.

I was interested to see that 77% of CA's water goes to agriculture and 13% goes to residential use, according to a UCLA report from 2009. In reports on the South Coast Hydrologic Region, covering 11,000 square miles or 7 percent of the state's total land and the most urbanized and populous region, 54% of water goes to residential use. This area includes all of Orange County and portions of Ventura, Los Angeles, San Bernardino, Riverside, and San Diego counties. Reports in the San Jose *Mercury News* earlier this year shows the average California uses 196 gallons of water per capita per day. But Palm Springs uses 736 gallons per capita per day, much presumed to be for pools, and Vernon uses a huge 94,111 gallons per capita per day, most attributed to industrialized uses.

I cite these figures because it is important to consider the residential impact of substituting desalinated water for residential purposes. I say this because my experience with desalinated water is that the quality for human consumption is less than optimal. I think those whose water will be used for human consumption should always have the opportunity to speak to their preferences how and whether the desalinated water is an acceptable option for their community. I suggest that while desalinated water may be sufficient for certain purposes, like industry and pools, it isn't necessarily the most appropriate choice for human consumption. I believe this quality issue is vital to consumers and should be addressed in your final report.

Further, ocean life and the environment need to be considered before desalination designs and site selection options are narrowed. Certainly the subsurface intakes have been shown safer for marine life, and the positioning and arrangements of intake and outflow as well as the impact on various species indigenous to and transient through selected areas needs to be thoroughly evaluated in every case. Industry domination of studies cannot be allowed to substitute for due diligence on the part of water authorities.

Finally, the energy consumption for the plants needs to be included in the impact

analysis for every desalination plant proposal. These huge complexes consume significant power, and the environmental impact of the energy sources should be evaluated as part and parcel of the cost to the area. Desalination projects are not stand alone, environmentally neutral energy consumers. The effect of power sourcing can have a significant impact on the air quality locally as well as affecting climate change factors. These tangential costs of the desalination equation must be included in the pre-approval evaluations of each individual plant proposal and should not be swept under regulatory awareness. Explicit inclusion not only of the immediate impact but the long tail costs associated with fossil fuel clean up need to be factored in to every consideration.

As a concerned citizen in Southern California, I urge the Board to include these considerations before final approval of your desalination policy. Environmental and consumer advocacy groups, not industry spokespersons, have the interest of California citizens at heart, and should have more influence on your choices than corporate pressure.

Sincerely,

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