

**State Water Resources Control Board & Department of Water Resources
Joint Hearing on Global Warming and Water – August 23, 2007
Oral Comments – Joe Geever, California Policy Coordinator, Surfrider Foundation**

My name is Joe Geever and I am the California Policy Coordinator. Thank you for holding this hearing and investigating ways to turn the recent policies on global warming and restoring ocean health from the Legislature and the Governor's office into action items. They say talk is cheap. But what we're discovering is that action may be even cheaper in the long run – given immediate proper guidance and enforcement from our State agencies.

I'll admit that Surfrider was not an expert in water management until a friend convinced me to look into ocean desalination about five years ago. She's here today and I want to jokingly thank her for complicating my life and the countless sleepless nights – but sincerely thank her for opening my eyes to the movement to integrate water management with Clean Water Act enforcement.

I want to briefly share Surfrider's position on water supply alternatives and priorities – and then contrast that to the new fad to develop numerous ocean desalination facilities statewide.

Water Supply Alternatives

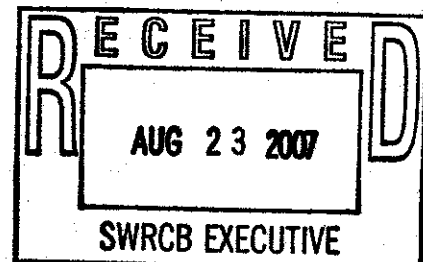
We recognize the problem of water shortages under the current allocation scheme as a serious concern. We also are keenly aware that global warming will only exacerbate these problems – as well as the adverse impacts it is wreaking on healthy ocean eco-systems.

But, it appears solutions are staring you in the face – yet the barriers to implementation are the very agencies entrusted to enact the solutions. Let me give a couple simple examples:

Water conservation from proper irrigation and residential landscaping can dramatically reduce Southern California's demand on the State Water Project and diversions from the Colorado River. This priority would be a net decrease in greenhouse gas emissions, dramatically reduce the intractable problem of urban run-off, and beautify neighborhoods. But, Metropolitan Water District offers the lowest incentives for conservation and water agencies allocate the lowest budget for conservation. It turns the state's policies on their head.

Wastewater recycling is similar in that it reduces energy consumption and reduces partially treated discharges to the ocean. Again, prioritizing and incentivizing this alternative meets the goals of the Legislature and Governor's office on reducing greenhouse gases and restoring healthy oceans and coastal waterways.

Finally, but possibly most importantly, the State needs to strictly enforce regulations against wetlands loss and degradation – as well as prioritizing investments in "constructed treatment wetlands" that cleanse polluted run-off, create habitat for numerous listed species, and offer urban communities a little piece of nature in their neighborhood. We have to applaud Orange County for implementing this and the other recommendations above. But, unfortunately their progressive and integrated approach is the exception rather than the rule.



Ocean Desalination

Surfrider Foundation has also devoted a lot of our time researching the new fad – ocean desalination. Our conclusion is that there are potential techniques for reducing the extremely energy intensive single pass RO process. Maybe you didn't know, according to experts using the state's calculation method, the ocean desalination proposal moving through the permitting process first – the Poseidon/Carlsbad project – will create between 95,000 metric tons to 170,000 metric tons of CO2 per year. And, maybe closer to our heart they refuse to objectively consider alternative intake systems that will eliminate marine life mortality. Even more offensive, they intend to "backdoor" the project into MWD's rebate incentives by pretending to be a City project when it is obviously a private entity not entitled to the rebates.

I could go on and on about the environmental and economic problems this proposal raises. But, what really offends us is that the City, the Regional Board, and the State Board have refused to take our requests for a thorough review seriously. Poseidon makes claims that there are scale economies that demand this design – without any proof. They also constantly repeat that the project will reduce reliance on the State Water Project – thereby offsetting the greenhouse gas emissions – again without any evidence of how that's going to happen. Our calculations show that even if they eliminated imports on a one-to-one basis – the desal plant would still be a net increase in greenhouse gas emissions. Remember, the policy is to reduce cumulative emissions by some pretty tough targets and deadlines – not permit projects that purport to only marginally INCREASE net emissions.

The State can insist on strict adherence to laws and policy on greenhouse gas emissions, water pollution elimination and marine life protection. But, so far, we haven't seen much in the way of progressive action.

So, we're hopeful that these hearings will lead to available water supply solutions that integrate greenhouse gas reductions, ocean health restoration, and watershed restoration. We're willing to help and I don't want to leave an adversarial taste in your mouth. In fact we are currently working with several agencies on a conservation and pollution reduction program called "Ocean Friendly Gardens" and advocating wastewater recycling and treatment wetlands where we can. But, at the end of the day – these are mandates of state law and policy that you have to enforce.

