THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

November 13, 2024

Ocean Desalination
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

To whom it may concern:

Subject: SWRCB Potential Amendments to Seawater Desalination Provisions of the Ocean Plan

This letter provides comments on the State Water Resources Control Board's (SWRCB) Potential Amendments to Seawater Desalination Provisions in the California Ocean Plan (Amendments). The Metropolitan Water District of Southern California (Metropolitan) supports local seawater desalination projects in order to create a diverse and climate-resilient water supply portfolio.

The Need for Desalination

Metropolitan is the primary water wholesaler for Southern California, serving our 26 Member Agencies within a 5,200 square mile service area. Metropolitan's mission is to provide our service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan and our member agencies remain statewide leaders in water conservation, wastewater recycling, and groundwater recovery. A summary of our Region's achievements can be found at this link.

Due to climate change, Metropolitan and the state of California forecast a decrease in the reliability and supply of the State Water Project and the Colorado River over the coming decades. Metropolitan is currently analyzing potential pathways for future investment to meet resiliency and reliability goals under our Climate Adaptation Master Plan for Water (CAMP4W). The new reality of a hotter, drier future necessitates an increased need for additional climate-resilient supplies.

A recent 2023 statewide survey by the Public Policy Institute of California (PPIC), PPIC Statewide Survey: Californians and the Environment, found that an overwhelming majority of adults (73 percent) favor building desalination plants on the California coast. Additionally, the Governor's August 2022 report, California's Water Supply Strategy: Adapting to a Hotter, Drier Future, identified desalination as a drought-resilient resource needing development and investment. As California's traditional water supplies decline and become less reliable over the coming decades, it is imperative that desalination remain a viable resource option for coastal regions.

Comments

Determination of Need: The Ocean Plan requires the use of an integrated water resource management and needs assessment, such as an Urban Water Management Plan, for determining the need for seawater desalination facilities. This provision and future amendments have the potential to obstruct locally elected officials and water agency managers from developing resilient resource portfolios in a timely manner. This process and determination should be led by water agencies, who have the technical and geographical expertize to evaluate the sizing and need of a desalination project. Water agencies need the option to develop larger regional-scale projects in order to sufficiently prepare for a hotter, drier future.

Offshore Desalination: Offshore desalination technologies continue to progress and be evaluated globally. Many of these technologies have proven to be scalable while addressing many of the concerns discussed in the Ocean Plan. In preparation for the future, the inclusion of innovative technologies such as offshore desalination should be incorporated into the Ocean Plan. There are currently multiple water agencies pursuing pilot studies in our state. A permitting pathway should be provided for these innovative offshore desalination technologies as well as other future innovative technologies seeking permits for California pilot studies.

Loading Orders: Metropolitan strongly promotes the use of a diversified resource portfolio that promotes reliability and sustainability in Southern California. The State's Seawater Desalination Siting and Streamlining Report to Expedite Permitting promotes the maximization of all alternative supplies first before establishing a need for seawater desalination. This amounts to a "loading order," which is inconsistent with the development of a diversified resource portfolio and the Governor's climate-resilience strategy in preparing for a hotter, drier future.

Prescribed loading orders restrict the authority of water agencies and dictate the structure of an agency's supply portfolio. This strategy does not take into consideration the nuances of a water agency's service area or the flexibility needed to increase an agency's resiliency with respect to climate, budget, and integration needs. Seawater desalination should be developed in concert with alternative supplies and at the discretion of locally elected officials and water agency managers.

Thank you for considering our comments and providing us with this opportunity.

Please contact Patrick Murphy of my staff at (213) 217-7122 or via e-mail at pmurphy@mwdh2o.com if you have any questions.

Sincerely,

Brandon J. Goshi
Interim Manager, Water Resources Management

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