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July 9, 2025

Ms. Amanda Gagliardo  
Environmental Program Manager  
Metropolitan Water District of Southern California  
700 N. Alameda Street  
Los Angeles, CA 90012

**Subject: Comments on Draft Environmental Impact Report for Pure Water Southern California**

Dear Ms. Gagliardo:

On behalf of the Southern California Water Coalition (SCWC), we appreciate the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Pure Water Southern California project. SCWC represents a broad cross-section of leaders from public agencies, cities, counties, business, labor, academia, and the environmental justice community committed to securing a sustainable, reliable, and affordable water future for all Southern Californians.

SCWC recognizes Pure Water Southern California as a landmark investment in regional water resilience. The project's potential to provide up to 150 million gallons per day of highly purified water offers an important step forward in diversifying Southern California's water portfolio and strengthening our local supply diversity and portfolio resilience. We commend the Metropolitan Water District and the Los Angeles County Sanitation Districts for their leadership in advancing this bold regional partnership.

However, we also believe it is important to acknowledge and address several key considerations in the DEIR to ensure that the project can meet its long-term goals without unintended impacts on affordability or system interdependence.

**Continued Reliance on the State Water Project**

Pure Water Southern California is not a standalone solution. The project will continue to rely on imported water—particularly from the State Water Project (SWP)—to function effectively within an integrated regional supply system. SWP water remains essential to meeting base demands, supporting groundwater replenishment, and providing blending flexibility for overall water quality. As such, the DEIR should more explicitly acknowledge that recycled water will supplement, not replace, imported water, and that investments in local supply must be coupled with continued support for securing SWP reliability.





### **Cost, Affordability, and Energy Considerations**

Advanced treated recycled water—while drought-resilient and locally controlled—generally comes at a higher unit cost and greater energy intensity than traditional supplies under average hydrologic conditions. SCWC believes the DEIR would benefit from a more robust and transparent discussion of these cost and energy tradeoffs, particularly in the context of long-term ratepayer affordability.

We recommend that Metropolitan explore and communicate strategies for mitigating energy-related impacts through energy recovery, load shifting, and coordination with clean energy providers. We also urge the project partners to ensure that affordability considerations, especially for disadvantaged communities, are fully integrated into future implementation and financing strategies.

### **Strategic Role in a Diversified Portfolio**

Despite these concerns, SCWC affirms that Pure Water Southern California remains a critical component of a diversified water supply portfolio that is resilient to climate volatility, regulatory restrictions, and seismic risk. Its value as a supplemental supply will grow as pressures on imported water increase and the reliability of traditional sources becomes more variable. The project can help stabilize long-term costs by buffering the region from the escalating risks and costs of emergency water transfers, dry-year scarcity pricing, and potential reductions in SWP allocations.

### **Conclusion**

In closing, SCWC supports the advancement of Pure Water Southern California as a high-value investment in regional water security. We respectfully encourage Metropolitan and its partners to ensure that the final EIR more clearly addresses the interplay between recycled and imported water, the long-term implications for affordability, and strategies to manage the project's energy footprint.

We thank you for your leadership and for considering these comments as part of the environmental review process. SCWC remains committed to working collaboratively with all stakeholders to ensure the successful implementation of this critical project.

Sincerely,

A handwritten signature in black ink on a light beige background. The signature is cursive and appears to read "Charley Wilson".

**Charley Wilson**

Executive Director

Southern California Water Coalition