Rockland County does not need Suez United Water’s proposed desalination plant. To allow Suez United Water (UW) to build an unnecessary desalination plant—one that would harm Rockland residents’ health, environment, and economy—would be criminal.

The citizens of Rockland County, our County government, and our Town and Village governments have overwhelmingly spoken out against the proposed desalination plant. Most importantly, our County government has called UW’s proposal unnecessary and has pledged to create a comprehensive water management plan. This should be the end of the issue—UW’s proposal should be long dead by now.

Shouldn’t the people of Rockland County and our County government decide how best to manage and supply ourselves with water?

Does Governor Cuomo want to take all control of Rockland County’s water away from the people of Rockland County and our County government and hand it over to the French multi-national corporation Suez? It boggles the mind.

Rockland citizens and our County government should have the ultimate say in the management of our water—not a foreign corporation. And Rockland citizens and our County government have spoken: we do not need a desalination plant and we will pursue a comprehensive water management plan.

The only reason that UW’s proposed desalination plant got as far as it did is that the County government and the PSC have blindly trusted UW in the past and allowed them to basically do whatever they want (which is of course to make as much money as possible for their shareholders while providing the bare minimum to their customers).

Fortunately, at least in the case of the County government, that has changed. Rockland’s Legislature, Executive, and Department of Health have all realized the costly error in not questioning UW’s proposals in the past. Rockland County has called the desalination plant
unnecessary, too costly, dangerous to the environment, and dangerous to the health of Rockland residents. Rockland County is finally assuming an active role in managing our most precious resource, our water. Rockland County has pledged to create a comprehensive water management plan.

So why are we still talking about UW’s proposed desalination plant? Who is in charge: the people and government of Rockland County or a French multi-national corporation?

To whom does Andrew Cuomo answer: the people and government of Rockland County or a French multi-national corporation? I guess we’ll find out soon enough.

Whether or not the PSC and Governor Cuomo will continue to let Suez UW do whatever they want without question remains to be seen.

Conservation

To date, Rockland County has no comprehensive water conservation program. There is huge scope for water conservation in Rockland County. Rockland County has pledged to create a comprehensive water conservation program. Let us see what gains we can realize with this before we give UW a blank check to build a desalination plant.

Rockland residents use a huge amount of drinking water to water their lawns in summer months. There is huge scope of water conservation in this area. Summer monthly demand for single family residential use is on average 25% greater than winter monthly demand.

UW employees turn red in the face with anger when anyone even mentions the word conservation. They refuse to listen to reason and simply see lost dollar and euro signs. Rockland residents responded effectively to our recycling program when it was implemented many years ago. We will do the same for a water conservation program.

I call your attention to the comments of Columbia University Professor Stuart Braman:
Comments on Section 4.1: “The Contention That Aggressive Water Conservation Measures Can Be Used to Reduce Demand Enough to Avoid the Need for a Water Supply Project is Not Correct”

1. This is a mischaracterization of what many of the public hearing commenters, including Al Appleton and myself, said. We did say that aggressive conservation measures could make a contribution to reducing the gap between projected demand and supply, we did not say that aggressive conservation measures alone could reduce demand enough to avoid the need for a water supply project. Commenters did talk about the possibility that a combination of aggressive conservation measures, aggressive leak management and changes in the management of Lake DeForest could, in combination, add up to enough savings to avoid the need for a water supply project. UWNY’s continual focus on the fact that aggressive conservation alone won’t avoid the need for a water supply project continually reinforces the company’s clear reluctance to genuinely consider any possible incremental demand reductions that could be achieved with new more aggressive conservation programs.

2. UWNY notes that “Per capita water consumption in United Water’s Rockland County service area is already low, and there is limited room for additional savings through further conservation measures. It is true that per water consumption is relatively low, but it does not necessarily follow that additional potential savings could not make meaningful contributions to narrowing the gap between projected supply and demand. In fact, both industry benchmarks and 2012 work by Columbia University Sustainable Development workshops suggest the opposite – that new more aggressive conservation programs could in fact make a meaningful contribution to reducing demand. UWNY was invited to contribute survey data to the analysis undertaken at Columbia in order to make sure that the best available information was used, but they declined, nor have they ever commented on the results of this research, providing and analytic response that would suggest an alternate view. The results of the research referenced above were provided in my earlier testimony and submitted comments on this case.

3. UWNY notes that “As a private company United Water has no authority to enforce conservation measures by its customers”, but, to repeat what I noted in my earlier testimony:

   It is true that United Water can’t mandate water conservation, but the number of conservation actions United Water is legally empowered to take, with PSC approval, is far larger than the number of conservation actions United Water has no legal ability to undertake. They are:
Types of conservation actions United Water could undertake with Public Service Commission approval

- Pricing structure modifications, directed specifically toward discretionary water use
- Pricing structure modification to bring non-residential pricing structure in line with residential conservation-encouraging increasing block structure
- High efficiency toilet rebates, residential and non-residential
- High efficiency residential washer rebates
- Irrigation controller rebates
- Efficient watering nozzle giveaways
- Efficient pre-rinse spray nozzle giveaways for commercial and institutional food service customers
- Residential and nonresidential water audits and technical assistance to commercial and industrial users

Types of conservation actions United Water cannot legally undertake

- Ordinances, laws, resolutions, etc. prohibiting outdoor water waste, restricting hours and days of outdoor watering, etc.
- Establishing permit requirements for underground irrigation systems, requiring design approval, requiring rain sensors and limiting flow
- Requiring new development to be water neutral

4. While UWNY touts their water conservation device distribution program, it is modest in design and goals compared to the high efficiency toilet and washer rebate programs analyzed by the Columbia Sustainable Development Workshops. In none of their comments have they ever addressed the potential gains from these more ambitious kinds of programs, instead continually giving the impression that they have invested their analytic resources solely to defend no further action on demand management rather than assessing what might actually be accomplished.
5. On p. 14 UWNY talks about the sensitivity analysis they did conduct to determine what future demand reduction could result from increased use of water conserving fixtures, but their choice of a 0.1%/year increase in efficiency is entirely opaque. It is impossible to assess their analysis as a result. Even this modest improvement yields 1.9mgd or 25% of the eventual desalination plant production.

Desalination is Too expensive

Rockland County is not a wealthy County. Unlike neighboring Westchester County and Bergen County, we do not have wealthy residents. We are a county of middle class people with a growing amount of poor people. We simply cannot afford to give UW a blank check to build a desalination plant that is not necessary.

There are countless examples around the world of desalination plants placing crippling economic burdens upon communities. For example, the Worthaggi plant could ultimately end up costing $18 to $19 billion, including all interest payments - before paying for the actual water. This is shocking.

Economist and publisher of Global Water Intelligence Christopher Gasson laid out his Ten Top Desal Disasters (published in 2012 on Desalination.com)

1. *Palm Jumeirah, UAE (2007)* – A demand miscalculation; they built it, no one came
2. *Jeddah 1, Saudi Arabia (1966)* – Acid attacked MSF plant
4. *Point Lisas, Trinidad (1999)* – EPC costs spiral and parties dispute
5. *Ad Dur RO, Bahrain (1990)* – Pretreatment failure for large SWRO
6. *Carlsbad, California (1998-?)* – 14 years in development and startup date still uncertain
8. *Carboneras, Spain (2002)* – Farmers failed to pay for desalted water
9. *Lok On Pai Plant, Hong Kong (1972)* – A big, stand-alone MSF that never ran and, the number one desal disaster is:

As Gasson writes:

The point that I’m trying to make is that the biggest risk in the desal business is not on the technology or operations side of a project—it is on the demand side. Hong Kong, Carboneras, Santa Barbara and Palm Jumeirah all entailed a significant waste of money because the demand for water never came as expected, and as a result, tens of millions of dollars were wasted.
**UW Proposed Desalination Plant Threatens Our Health**

As Rockland residents have been repeating for six years now, there is nowhere else in the country—nor the world—where a desalination plant, or any drinking water facility, is located 2-3 miles directly downstream from an aging and leaking nuclear power plant that should already be closed down. Once again, desalination cannot remove nuclear waste from the Hudson River. All together now, on a daily basis Rockland residents—or most disturbingly Rockland children—would be drinking radioactive waste. The not too unlikely nightmare situation is if Indian Point experienced a great-than-normal leak of radioactive waste into our drinking water. As we all know, UW and Entergy do not report dangerous leaks and levels of toxicity in a timely manner.

Even Governor Cuomo knows what a disaster and threat Indian Point it is. So why does Governor Cuomo want to force Rockland residents—and Rockland children—to drink radioactive waste?

There are decrepit pipes and a huge amount of contaminated water beneath Indian Point. Governor Cuomo knows the shockingly decayed state of the pipes beneath Indian Point. Indian Point is leaking nuclear waste all the time, but Entergy doesn’t even know where these leaks are coming from.

Think of the disastrous impacts upon the health of US sailors in the Pacific who drank desalinated water from the Pacific after Fukishima. They all have cancer and other radiation related illnesses. Why knowingly take this risk with Rockland residents as well?

And the age old question, why is it that when Entergy is applying for renewal for Indian Point, the Hudson River is not a source of drinking water and yet when Suez UW is applying to build a desalination plant it is? How can the Hudson simultaneously be a source of drinking water and not a source of drinking water?

Furthermore, the DEC just approved ARCO's plan to cleanup PCB-contamination at the former Anaconda Wire and Cable company property (now called Harbors at Hastings). Thus there will be further threats to the proposed source of drinking water.

Thank you for your attention.
Yours sincerely

Alexis Starke