

January 25, 2022

Tom Luster
California Coastal Commission
45 Fremont St, Ste 2000
San Francisco, California 94105

Sent via email: Tom.Luster@coastal.ca.gov

Re: Expert Reports: Lack of Need for Water from the Poseidon Desalination Plant

Dear Mr. Luster,

On behalf of the environmental coalition, we appreciate your consideration of the attached expert reports and their inclusion into the administrative record. Poseidon asserts that there is a documented compelling need for the Poseidon – Huntington Beach Project. The expert reports enclosed within are evidence to be considered as part of the administrative record and demonstrate that there is no need for Poseidon’s water.

The enclosed expert reports offer a third-party analysis of the legal, economic, and technical accuracy of Poseidon’s assertions of “need.”

- **Municipal Water District of Orange County 2018 Water Reliability Study.** In 2018, MWDOC completed a “Water Reliability Study” that introduced new data points to consider for predicting future water demand. The study also analyzed several supply alternatives to meet future demand and ranked the alternatives for both reliability and cost. Poseidon was found to be the least cost-effective and most financially risky of any of the potential water supply alternatives studied and would produce four times the average amount of water needed even in dry years.
- **Municipal Water District of Orange County 2020 Urban Water Management Plan.** In California, every five years water supply agencies prepare Urban Water Management Plans (UWMP) which include predicted demand for water and alternatives for meeting that demand for the subsequent 25-year period. Most recently, the 2020 UWMP published by MWDOC in the Spring of 2021 concluded the region would reliably meet predicted water demand for the next 25 years, including the extreme planning for five consecutive years of drought, without inclusion of the proposed Poseidon project.
- **Fryer Expert Report (2016) A Review of Water Demand Forecasts for the Orange County Water District** – The Fryer Report reviewed the 2015 UWMPs from throughout Orange County and concluded that the Urban Water Management Plans relied upon by Poseidon were flawed and did not prove supply demand for the proposed project. The 2020 MWDOC UWMP described above confirms this. Fryer demonstrated that the Poseidon application does not include a defined and documented need for 50 MGD in water supply that cannot otherwise be met by alternative means.
- **City of Garden Grove: Desalination – a White Paper on the Garden Grove Perspective (2015).** This White paper was prepared in 2015 to provide the Garden Grove City Council with information and analysis regarding an ocean water desalination facility in Huntington Beach being proposed by the Poseidon Resources Corporation. The analysis presents costs and benefits as the project relates to the City of Garden Grove. The report concludes that when compared to other options, a desalination facility is a relatively expensive option for a new potable water

supply for the City of Garden Grove and will not immediately resolve the City water's conservation mandate.

We respectfully request these reports be considered by the Coastal Commission as part of the administrative record. The reports individually, and in whole, demonstrate that Poseidon's water is not needed.

Sincerely,

A handwritten signature in black ink that reads "Raymond F. Hiemstra". The signature is written in a cursive style with a large initial 'R'.

Raymond Hiemstra
Associate Director of Programs
Orange County Coastkeeper