

January 24th, 2022

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

Sent via email: [Tom.Luster@coastal.ca.gov](mailto:Tom.Luster@coastal.ca.gov)

Re: Expert Reports: Feasibility of Subsurface Intakes at the Poseidon – Huntington Beach Desalination Plant

Dear Mr. Luster,

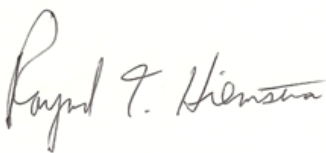
On behalf of the environmental coalition, we appreciate your consideration of the attached expert reports and their inclusion into the administrative record. Poseidon asserts that subsurface intakes are infeasible for the Poseidon – Huntington Beach Project proposal. The expert reports enclosed within are evidence to be considered as part of the administrative record and demonstrate that Poseidon's assertions that subsurface intakes are infeasible are legally flawed.

The three enclosed expert reports were commissioned by Orange County Coastkeeper to offer an independent third-party analysis of the legal, economic, and technical accuracy of Poseidon's application materials as they relate to the feasibility of subsurface intakes.

- **HydroFocus Expert Reports Huntington Beach Seawater Desalination Facility Groundwater Model** – The first HydroFocus report prepared in 2016 identified limitations and uncertainty with the Geosyntec model developed on behalf of Poseidon to conclude slant wells were infeasible at Poseidon's predetermined site. HydroFocus concluded that the Geosyntec model results were inconclusive until physical tests could verify the computer modeling. The second HydroFocus study prepared in 2020 concluded slant wells may help manage seawater intrusion of the Talbert Aquifer. Also included with these reports are a presentation used by HydroFocus at the Regional Water Board hearing and a State of California Manual for the Best Management Practices for Groundwater modeling.
- **Hanemann Expert Report (2018) An Assessment of the Reports on the Proposed Huntington-Poseidon Seawater Desalination Project Prepared by the Independent Scientific Technical Advisory Panel (ISTAP)** – The Hanemann report concluded that the ISTAP Phase 1 and Phase 2 reports inappropriately asserted that slant wells are technically or economically infeasible according to the requirements set forth in the Ocean Desalination Amendment to the California Water Quality Control Plan for Ocean Water.

We respectfully request these three expert reports be considered by the Coastal Commission as part of the administrative record. The reports individually, and in whole, demonstrate that Poseidon's assertions are legally flawed and do not meet their burden of demonstrating that subsurface intakes are infeasible for the Poseidon – Huntington Beach project proposal.

Sincerely,



Raymond Hiemstra  
Associate Director of Programs  
Orange County Coastkeeper