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July 7, 2016

Via e-mail: Kurt.Berchtold@waterboards.ca.gov

Kurt V. Berchtold
Executive Officer
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

Dear Mr. Berchtold:

I am writing regarding the Santa Ana Regional Water Quality Control Board's ("Regional Board") consideration of the proposed Huntington Beach Desalination Project.

The Municipal Water District of Orange County ("MWDOC") is the County's wholesale water supplier and resource planning agency. MWDOC covers all of Orange County with the exception of Anaheim, Fullerton and Santa Ana, serving imported water to about 2.4 million residents. Our efforts focus on sound planning and appropriate investments in water supply development, water use efficiency, public information, legislative advocacy, water education, and emergency preparedness. We are committed to providing a reliable supply of high quality water for Orange County. Working closely with the Metropolitan Water District of Southern California (MET) and our 28 Member Agencies, MWDOC looks for opportunities to improve Orange County's water resources and reliability.

On May 6, 2015, the State Water Resources Control Board ("State Water Board") adopted Amendments to the Water Quality Control Plan for Ocean Waters of California Addressing Desalination Facility Intakes, Brine Discharges, and Incorporating Other Non-substantive Changes (the "Desalination Amendment"). The Desalination Amendment took effect as new regulation on January 28, 2016.

Chapter III.M.2b.(2) of the Desalination Amendment states, "*Consider whether the identified need for desalinated water is consistent with an applicable adopted urban water management plan prepared in accordance with Water Code section 10631, or if no urban water management plan is available, other water planning documents such as a county general plan or integrated regional water management plan.*"

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In May 2016, MWDOC adopted its 2015 Urban Water Management Plan (“UWMP”) Update. The UWMP Update finds that MWDOC’s service area total direct and indirect demands in FY 2014-2015 were 499,120 AF, which was met by approximately 225,000 acre feet (45%) of imported water. Under normal conditions, total direct and indirect water demands are projected to increase to 515,425 AF by the year 2040 with Orange County still relying on imported water for over 200,000 AF per year without the development of NEW supplies (this assumes large investments in water use efficiency continue and that OCWD’s Groundwater Replenishment System is expanded to 130,000 acre-feet per year).

MWDOC’s UWMP Section 7.3 “*Planned Water Supply Projects and Programs*” identifies the proposed 50 MGD Huntington Beach Desalination Project as one of a number of projects that could help meet future projected demands as well as reduce the County’s demand on imported water. The Huntington Beach Desalination Project was also included as one of a number of potential water supply projects in our recent Orange County Water Reliability Study (just now circulating as a draft report). The purpose of the Reliability Study was (1) to evaluate the reliability of imported supplies in the absence of new water investments in Southern California and then (2) to test the improvements made by NEW supply projects that could be implemented. The Reliability Study found that without the California WaterFix and without any NEW supply projects, Orange County would have shortages in 8 of 10 years. Even with completion of the California WaterFix, additional water supply projects by MET, the MET Member Agencies or projects developed within Orange County are needed for Orange County to be fully reliable out to the year 2040.

In this regard, the proposed 50 MGD Huntington Beach Desalination Project appears to comply with Chapter III.M.2b.(2) of the Desalination Amendment.

If you have any questions about MWDOC’s UWMP 2015 Update or our recently completed Reliability Study, please feel free to contact me.

Sincerely,



Robert J. Hunter
General Manager

cc: MWDOC Board
Scott Maloni, Poseidon Water