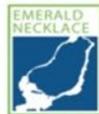
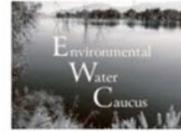
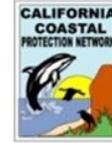


# Environmental Coalition



# Lack of need for Poseidon is well documented

- **Lack of Water District/City commitments for Poseidon water**
- **OCWD Term Sheet- Customers/Distribution system not identified**
- **MWDOC Water Reliability Study**
- **City of Garden Grove white paper**
- **IRWD Concerns**
- **OCWD exaggeration of need**
- **Poseidon capture of OCWD for survival**
- **Poseidon Carlsbad example**

# Residents for Responsible Desalination

“Identified Need”

Vs

Alternative Supplies

Law and Regulation Summary

# Water Code 13142.5b

For each new or expanded coastal powerplant or other industrial installation using seawater for cooling, heating, or industrial processing, the **best available** site, design, **technology**, and mitigation measures feasible **shall be used to minimize the intake and mortality of all forms of marine life.** (emphasis added)

## OPA Section III.M.2.d(1)(a)

Subject to chapter M.2.a.(2), the regional water board in consultation with State Water Board staff **shall require subsurface intakes** unless it determines that subsurface intakes are not feasible based upon a comparative analysis of the factors listed below for surface and subsurface intakes.\* **A design capacity in excess of the need for desalinated\* water as identified in chapter III.M.2.b.(2) shall not be used by itself to declare subsurface intakes\* as not feasible.** (emphasis added)

## OPA SED at pg. H-12

[The] proposed Desalination Amendment is still adequately flexible in that if subsurface intakes are not feasible, a screened surface water intake can be used for all or a portion of the intake. Or alternatively, a plant can be scaled down or redesigned so that subsurface intakes can be used. Also, regional needs can be met by other water resources like water recycling or groundwater storage when water is abundant.

# Alternatives are Available

- The OPA requires the “identified need” be consistent with an UWMP.
- The MWDOC UWMP and Reliability Study document alternatives that are consistent with the examples given in the OPA SED: “recycled water”, “groundwater storage when water is abundant”
- This is not a “loading order.” MWDOC and OCWD can prioritize whatever alternative they prefer – including desalination. But they have to use subsurface intakes to minimize intake and mortality of marine life.
- There is NO economic analysis of slant wells, and the technical feasibility analysis is inadequate.
- This Board CANNOT approve surface intakes!



Humboldt BAYKEEPER  
Klamath RIVERKEEPER  
Yuba River WATERKEEPER  
Russian RIVERKEEPER  
Monterey COASTKEEPER  
Santa Barbara CHANNELKEEPER  
Los Angeles WATERKEEPER  
Orange County COASTKEEPER  
Inland Empire WATERKEEPER  
San Diego COASTKEEPER

# Poseidon – Huntington Beach Draft Permit

May 15, 2020 Santa Ana Regional Water Board Workshop

Sean Bothwell, Executive Director, California Coastkeeper Alliance

# Board Members' Informational Requests Have Not Been Fulfilled

- Board Member Von Blasingame
  - "...maybe you could supply us with some of the background on [pipeline] costs prior to the next -- because the numbers on the surface, a half a billion dollars for that length of pipe, it seems to me that the operating expenses should be similar."
- Board Member Peterson
  - "I feel like I need to see more environmental studies"
  - "I cannot get past the fact that I feel like the environmental data and impact on this feels flawed"
  - "I know it's Poseidon's request to have 50 MGDs, but what does it look like if it's like 20 or a lesser number; right?"
- Board Chair Ruh
  - "I wondered if we had our own statistics or something from a neutral third-party?"
- Board Member Rivera
  - "I would like to see is a summary of the testimony that was made today and, possibly, divided into specific issues or specific topics"

Reminder: Best  
Available Design has  
NEVER BEEN  
INDEPENDENTLY  
ASSESSED

**How is the Proponents Pre-Determined Size (50 MGD) the Best Available to MINIMIZE Marine Life Mortality?**

**Chapter III.M.2.d.(1)(a)ii:** “If the regional water board determines that subsurface intakes are not feasible for the proposed intake design capacity, *it shall determine whether subsurface intakes are feasible for a reasonable range of alternative intake design capacities.*”

**Chapter III.M.2.c.:** “Design is the size, layout, form, and function of a facility, *including the intake capacity* and the configuration and type of infrastructure, including intake and outfall structures.”

# HydroFocus I Report

- Report's Conclusion: Reliance on the Geosyntec computer modeling results submitted by the Applicant, **WITHOUT ADEQUATE CALIBRATION, FAILS** to accurately depict the volume of freshwater that may be withdrawn in slant wells.
- Calibration is a Standard Practice
  - Calibration of Computer Modeling is a SGMA Best Management Practice
  - The Doheny Desalination and the CalAm-Monterey Desalination project proposals **BOTH CONDUCTED TEST WELLS FOR CALIBRATION**
  - A series of test wells were drilled to calibrate the Talbert Gap seawater intrusion barrier in the 1970s

# HydroFocus II Report

- HydroFocus I ALSO concluded that slant wells would move the freshwater/seawater transition zone of the Talbert Aquifer seaward
- HydroFocus II considers the effects of modifying the OCWD Seawater Intrusion Barrier to further reduce freshwater withdrawals from slant wells
- HydroFocus II Conclusion: modifying the seawater intrusion barrier elevation may significantly alter freshwater mixing in a slant well intake while still maintaining protection of the aquifer

# Our May 15<sup>th</sup> Requests to the Regional Board

- Require Poseidon to drill a physical test well to calibrate model assumptions.
- Require an independent-third party review, consistent with the Desalination Amendment requirements, of the technical feasibility analysis and data submitted, including the potential for lower seawater intrusion barrier elevations.
- Review a range of design capacities – independent of OCWD's aquifer drawdown threshold – at Poseidon's pre-determined site AND AT OTHER ALTERNATIVE SITES.
- Conduct a third-party economic feasibility analysis of both a subsurface intake and an open-ocean intake at Site Stations D2 and U2.