



## **Residents for Responsible Desalination**

*"Organized for coastal protection advocacy and education about seawater desalination."*

October 30, 2019

The Honorable Gavin Newsom  
Governor, State of California  
State Capitol  
Sacramento, CA 95814

Re: ***Poseidon Huntington Beach Seawater Desalination Project***

Dear Governor Newsom:

On behalf of ***Residents for Responsible Desalination (R4RD)***, I am protesting the letter sent to you on August 8, 2019 by the ***Orange County Water District (OCWD)*** regarding the subject project.

First, R4RD is a grassroots non-profit founded in 2005 and granted 501(c)3 status in March 2007 to confront the wave of over 20 proposed seawater desalination projects up and down the California coast. Among such projects was and is the proposed Poseidon Water LLC desalination plant in Huntington Beach. R4RD considers this project the "poster child" for irresponsible desalination proposals—though Poseidon's currently operating desalination project is considered more irresponsible to such a degree that State regulations were restructured to assure it not be replicated.

Secondly, R4RD and its membership are very disappointed that a public agency, the *Orange County Water District*, would request you and the Office of the Governor intercede on deliberations of a State regulatory agency, the *Santa Ana Regional Water Quality Control Board*, on behalf of an out-of-state private company's proposed project, Poseidon Water LLC, in Huntington Beach. Especially on behalf of a private company that has attempted to thwart State regulations and the actions of local legislative bodies at every turn.

Furthermore, R4RD co-sponsored the appeal of the Coastal Development Permit (CPD) issued for the Poseidon project by the City of Huntington Beach in 2006. The appeal was based on nine issues, which the *California Coastal Commission (CCC)* deemed six of the nine as substantial by unanimous vote. Due to Poseidon's lapses, the City of Huntington Beach again issued the project a CDP in 2010. Again, R4RD et al. appealed the CDP to the CCC, which deemed the six issues again substantial.

The California Coastal Commission heard the project's appealed CDP application in November 2013. The delays were solely the result of Poseidon's repeated hesitance to provide the CCC requested documentation and related information. During the hearing the project's opposition raised enough critical issues to sway many of the Commissioners such that Poseidon pulled its application. Many of the opposition's issues had also been raised at City hearings in 2005, 2006, and 2010. Poseidon has had ample time and opportunity to address at least a few of these critical issues brought forward at the 2013 CCC hearing—but has not. Additionally, Poseidon has yet, after 15 years, to address or acknowledge the six substantial issues of the CDP appeal—but has not.

A question remains: Why would the Orange County Water District want the Office of the Governor to intercede in regulatory processes? OCWD functions to manage the Santa Ana River groundwater basin in Orange County. The proposed Poseidon project will supposedly produce desalinated water as a “new local water supply(s)” according to OCWD’s August 8 letter. Please take note that in the letter’s next paragraph OCWD admits the desalinated water will be for “offsetting imported demand”. The desalinated product water is meant to replace existing supplies of imported water, which over many decades has proven 100% reliable and far less costly than the product water.

Also take note that after over 15 years the project has been proposed, neither Poseidon nor OCWD has come up with a viable plan for distribution and delivery of the desalinated water. In fact, neither entity has established “a need” for the desalinated product water and the proposed project. Even using a small amount of the product water “...to augment supplies we inject in our Talbert Seawater Barrier to help prevent seawater intrusion into the groundwater basin” can be questioned. Such application of product water is not discussed anywhere in the CEQA documentation for the proposed project.

Overall, R4RD questions the necessity for the proposed Poseidon project in Huntington Beach and definitely questions the motives of the Orange County Water District to lobby the Office of the Governor on behalf of a private infrastructure conglomerate. Thank you for your attention to R4RD’s protestations.

Regards,

-Dave Hamilton, *president*

**-Residents for Responsible Desalination**

-Huntington Beach, CA

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