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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

April 15, 2021

Via electronic mail: bcoffey@mwdh2o.com

Mr. Brad Coffey
Group Manager, Water Resource Management
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012-2944

SUBJECT: Metropolitan Water District 2020 Urban Water Management Plan Draft Comments

Dear Mr. Coffey:

The Orange County Water District (OCWD) would like to provide the following comments on the Metropolitan Water District of Southern California (MET) 2020 Urban Water Management Plan Draft (2020 Draft UWMP) and asks that consideration of these comments be reflected in the final draft document scheduled to be issued in May.

As you may be aware, OCWD's 2015 Groundwater Management Plan identifies the proposed Project as a planned future water supply capable of providing up to 56,000-acre feet per year (50 MGD) of new supply, and the OCWD Board of Directors approved a term sheet in 2018 to guide future negotiations for the purchase of the Project's maximum capacity. The project will also be included in the District's 2021 Groundwater Reliability Plan which is currently being prepared. Poseidon Water anticipates that the facility could achieve its first full year of operation as early as 2027 assuming necessary permits and project approvals are obtained in the next 12 months. This projected operational date should be identified in MET's UWMP Draft Appendix 5 Table A.5-3.

Furthermore, the Draft UWMP could benefit from more clarity as it pertains to the Huntington Beach Desalination Project's identification as a planned future water supply. The DWR 2020c citation referencing state guidelines refers to the Department of Water Resources Urban Water Management Plan Guidebook 2020, 6-36, which states:

Recommended

It is recommended that Suppliers indicate the level to which desalination is being considered by describing whether each potential desalination source is: (a) conceptual in nature, (b) likely to be developed, (c) almost certainly to be developed, or (d) in the process of being developed or in use at this time. The information included in Submittal Tables 6-8 and 6-9 and the optional Planning Tool Supply Worksheet should only be if it falls under categories (c) or (d), but Suppliers may choose to include less firm desalination opportunities in their narratives.

Consultation with DWR staff indicates that the meaning of the word “develop” was intended using the standard definition as defined by Merriam-Webster.¹ The Project is in the late stages of development and has been in the state’s permitting process for almost twenty years. As such, the Project has secured property development rights and various local and state permits and approvals including, but not limited to, a Local Coastal Development Permit, Conditional Use Permit, California Environmental Quality Act certification, a National Pollutant Discharge Elimination System Permit from the Santa Ana Regional Water Quality Control Board and a land lease with the California State Lands Commission. The Project also has developed cost estimates, facility Engineering, Procurement and Construction bids, an invitation from the US EPA to apply for up to \$585 million in credit assistance under the Water Infrastructure Finance and Innovation Act, and a MET Local Resource Program application jointly submitted to MET in 2013 by all four of Orange County’s MET member agencies – Municipal Water District of Orange County (MWDOC) and the cities of Anaheim, Fullerton and Santa Ana, and subsequently updated in October 2015 by MWDOC. In fact, the development of the Huntington Beach Desalination Project could be the most mature of any seawater desalination project in the state of California.

MET’s 2020 Draft UWMP Table 3-13 labeled “*Seawater Desalination Projects Under Development within Metropolitan’s Service Area*” includes the proposed Project and correctly identifies its status as “under development” and in the permitting phase. However, it appears from the increase in water from future regional supplies identified in Tables 1-5, 2-1, 2-2, and 2-3 of MET’s Draft UWMP 25-year supply projections that MET is counting on facilities currently in a similar state of development (i.e., under development but not constructed) as the Huntington Beach Desalination Project but not including water from the Project itself. In this regard, MET might also consider reflecting the proposed Project’s 56,000-acre feet of supply in Tables 1-5, 2-1, 2-2, and 2-3.

In sum, the Project clearly meets the state’s definition of “developed” and should fall under DWR Guidebook guidance criterion (d) *in the process of being developed* and therefore should be specifically identified in relevant UWMP tables reflecting that it is a planned future water supply capable of providing a new sources of regional water supply within the 2020 UWMPs 25-year planning horizon.

Thank you for consideration of these comments.

Sincerely,



Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager

cc: Harvey De La Torre, MWDOC
John Kennedy, OCWD
Scott Maloni, Poseidon Water
OCWD Board of Directors

¹ April 8, 2021 email from DWR staff to Poseidon Water Vice President Scott Maloni. Merriam-Webster defines “develop” as **a**: to work out the possibilities of //develop an idea **b**: to create or produce especially by deliberate effort over time.