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September 14, 2017

Transmitted via Email: CEQA.comments@slc.ca.gov

Alexandra Borack, Project Manager
100 Howe Avenue, Suite 100-South
California State Lands Commission
Sacramento, CA 95825

Dear Ms. Borack:

Poseidon Supplemental EIR

I am writing regarding the State Lands Commission preparation of the Supplemental EIR for the Poseidon Seawater Desalination Project at Huntington Beach: Outfall/Intake Modifications & General Lease.

The Municipal Water District of Orange County ("MWDOC") is the County's wholesale water supplier and resource planning agency and the third largest member agency of Metropolitan Water District of Southern California (MET). 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 by working closely with MET and our 28 Member Agencies looking for opportunities to improve Orange County's water resources and reliability.

This letter is being written to address a specific regulatory requirement of the Ocean Plan Desalination Amendment which took effect in 2016. Specifically, it addresses two points: (1) is there a need for additional supply documented in the adopted 2016 MWDOC Urban Water Management Plan (UWMP) and (2) is the proposed project included in the UWMP. The answer to both these questions is yes.

The UWMP and MWDOC's 2016 Orange County Water Reliability Study (Reliability Study) outline a number of projects that can be implemented to improve water supply reliability in Orange County, including regional projects such as the California WaterFix and MET's proposed Carson Indirect Potable Reuse Project as well as the Poseidon Project and other projects in or serving Orange County. The Reliability Study emphasized that there are many routes to reliability and that different combinations of different projects (Scenarios) can produce future water reliability. Additional water supply projects are necessary but no one project is absolutely essential to meet reliability goals for southern California and Orange County. Some projects make greater and more cost-effective contributions to reliability - paramount among these in our estimation is the California WaterFix. Thus, the Poseidon project is only one of several different projects that can provide that supply, but neither the UWMP nor the Reliability Study state that the Poseidon project is specifically necessary to meet Orange County's future water supply needs.

If you should require additional information, please do not hesitate to contact me or Karl Seckel (kseckel@mwdoc.com; 714-593-5024).

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert J. Hunter".

Robert J. Hunter
General Manager

cc: MWDOC Board of Directors