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June 11, 2010

City of Huntington Beach
Planning Department
2000 Main Street
Huntington Beach, CA 92648
Attn: R. Ramos
Via fax: 714-374-1647

Re: Poseidon Resources Draft Supplemental Environmental Impact Report (DSEIR)

Dear Mr. Ramos,

The subject Draft SEIR states in Section 1.0, page 1-30:

“The Growth Assessment and General Plan Evaluation examine planned growth in Orange County and demonstrates that the potential water supply from the Seawater Desalination Project at Huntington Beach is not currently being relied upon to serve any new development projects of 500 dwelling units for which water supplies have been confirmed.”

The above statement is contradicted in the *Water Supply Assessment* of the *Beach-Edinger Corridor Specific Plan EIR* where in Section 7.1.1 desalinated water from the Poseidon project is listed among probable sources of supply for Beach-Edinger Corridor project. The Beach-Edinger Corridor Specific Plan was approved in March 2010. Section 7.1.1, page 7.2 of the *WSA* states:

“Desalination is a viable water supply for Huntington Beach at this time...” Farther along in the Section 7.1.1, second paragraph states: “Poseidon Resources Corporation (Poseidon) is the project applicant/proponent for a desalination facility in Huntington Beach and the City has entered into an agreement with Poseidon.”

And the entire third paragraph of the *WSA* “7.2 Summary of Plan for Obtaining Sufficient Supply” states:

“Huntington Beach as the water provider to the project area has put forth adequate due diligent evaluations that show good faith efforts in both short and long-term water supply planning. Environmental review was completed for a desalination facility and the City has entered into agreements with Poseidon, the desalination proponent. The City has also granted its approval of the desalination facility.”

Furthermore, the subject Draft SEIR repeatedly references the desalinated product water as “replacement water” for various determinations, e.g. greenhouse gas (GHG) emissions. Whereas, for the *WSA* for the *Beach-Edinger Corridor Specific Plan EIR* refers to the desalinated product water as “new water supply”. This is far more than a rhetorical difference for it goes to the most detrimental and significant of environmental impacts of the desalination project—greenhouse gas emissions, global climate change, and California’s AB32 compliance.

The SEIR should not be considered adequate until all of the above discrepancies are reconciled, corrected, and related project modifications are made.

Regards,
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HAMI3-1
HAMI3-2
HAMI3-3

HAMILTON, DAVID (HAMI3), JUNE 11, 2010

- HAMI3-1** As noted in Section 7.0 of the Water Supply Assessment for the Beach-Edinger Corridors Specific Plan, the conclusion that water supplies may be insufficient to meet projected demands is primarily due to recent State Water Project cutbacks related to the pumping restrictions, and a multi-year three statewide drought. The study did not anticipate or contemplate that these conditions would be permanent. Moreover, while seawater desalination is discussed in Section 7.1.1 of the report, the recommendations of the study that are contained in Section 8 of the report to help balance the regional supply and demand situations over the next 20 years, do not rely on seawater desalination as means to achieve such a balance. Instead, the report recommends measures that include conservation and water efficiency measures, as well as investigating use of reclaimed water and urban runoff. Therefore, the statements in the DSEIR which characterize the project's product water as a replacement of existing imported supplies is not contradicted by the conclusions and recommendations of the Water Supply Assessment for the Beach-Edinger Corridors Specific Plan.
- HAMI3-2** See Response HAMI3-1. The project will supply 56,000 afy to the participating water purveyors in Orange County, providing a direct, one-to-one replacement of imported water to meet the requirements of those participating water agencies, and thus eliminating the need to pump 56,000 acre-feet of water into Orange County. Therefore, the energy required for the project would be net of that required to import water to the region, and the calculation of net energy use is reasonable and appropriate for purposes of calculating greenhouse gas emissions.
- HAMI3-3** As noted in Response HAMI3-1, there are no discrepancies in the DSEIR raised in this comment letter, and therefore, no reconciliation, corrections to the DSEIR, or modifications to the project are necessary or required.