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STATE OF CALIFORNIA

COMMENT FORM

California American Water Company (CalAm) Monterey Peninsula Water Supply
Project Draft Environmental Impact Report

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Your input on the proposed project is greatly appreciated. If you have comments on the accuracy and adequacy of the Draft

Environmental Impact Report (EIR) for the Monterey Peninsula Water Supply Project (MPWSP) you can submit your comments by turning in this completed comment form tonight in the comment box located at the sign-in table; faxing your comments to (415) 8960332; emailing your comments to MPWSP-EIR@esassoc.com, or mailing them to the following address:

Attn: Andrew Barnsdale
California Public
Utilities Commission
c/o Environmental
Science Associates
550 Kearny Street, Suite 800
San Francisco, CA 94108

Comments should pertain to the accuracy and adequacy of the Draft EIR prepared for the MPWSP. All comments must be received by the CPUC no later than July 1, 2015. PLEASE PRINT LEGIBLY. Comment:

The following comments are focused on Appendix E1 and statements made in this appendix that are questionable, misleading or incorrect. The yellow highlighted sections are copied from the appendix and the paragraph below the highlighted and the related questionable statement underline.

1.0 EXECUTIVE SUMMARY

This technical memorandum summarizes predictive ground water modeling performed by GEOSCIENCE Support Services, Inc. (GEOSCIENCE) in the vicinity of the proposed test slant well at the CEMEX site and evaluates potential impacts on ground water levels and water quality (total dissolved solids) which may occur during the long-term pumping test.

The entire slant well addendum E1 is based on computer modeling of data from on shore wells and bore holes but no data taken from water drawn from a slant well intake water. The entire document is created by Geoscience Support Services, owned by Dr. Dennis Williams who incidentally is also the patent holder for slant well when used for sea water desalination. Why is the owner of the patent for slant wells conducting the testing and modeling when positive test result could be very profitable to his company? Shouldn't this be considered a major conflict of interest?

As a former research laboratory test technician I offer the following. One of the most important rules I learned as a test tech is that environmental impact decisions should only be made after environmentally positive, repetitive, reproducible, long term physical test results have been obtained and evaluated.

Modeling can be used in making decisions, but only when physical testing cannot be performed because the conditions are too dangerous, test equipment is not available, or the test environment is not reproducible. None of these limiting situations exists with desalination of seawater from Monterey Bay.

The environmental impact of any facility that will be used to desalinate sea water should always be considered as site specific. The environmental impact upon the Monterey Bay, the surrounding properties, the rivers feeding the bay and the underlying aquifers can only be evaluated thorough extensive testing in the Monterey Bay at a specific site.

There appears to be no physical or rational reasons for not performing the necessary testing to minimize environmental impact by a desalination facility on the Monterey Bay and its surrounding environment.

Using modeling as a way to insure minimal environmental impact as offered by the DEIR is just wrong! Cal Am has effectively acknowledged this in their published schedule that calls for the slant well to be tested for two years to prove it will be environmentally compatible. Unfortunately the schedule also calls for commencement of desalination plant construction prior to the conclusion of the slant well testing. Seem like someone is putting the cart before the horse

1.1 Findings

▼ Based on preliminary ground water modeling, the salinity in the test slant well increases with time approaching 96% ocean water after 16 months of pumping. Data collected during the long-term pumping test will be used to establish salinity trends.

Section 1.1 of appendix E1 states that sea water salinity will reach 98% after 16 months. How can this prediction be made without testing the operational slant well and establish a total dissolved solids (TDS) baseline. It has been reported that during the initial slant well test TDS of 16000 PPM were experienced indicating a ground water content of approximately 50%. This implies that 98% will be very difficult if not impossible to reach.

In the Dune Sand Aquifer after 8 months of pumping, model results show that water levels in MW-1, located 60 ft inland from the test slant well, would decline approximately 3 ft under Scenario 1 and approximately 4 ft under Scenario 2. This decline is directly proportional to the amount of well screen in the Dune Sand Aquifer—being higher in Scenario 2 and less in Scenario 1. Water level declines in the deeper 180-FTE Aquifer beyond 8 months of pumping average 5.6 ft and 2.3 ft for Scenarios 1 and 2, respectively (Table 4).

Section 1.1 of appendix E1 also states that after 8 months of slant well pumping the water level in the 180 foot aquifer will decline 5.6 feet. Does this mean that with 8 slant wells the aquifer level will decline 44.8 feet? Does that mean that this aquifer sea water intrusion will increase due to slant well pumping?

2.1 Background

California American Water (CalAm) is planning to increase their water supply portfolio to meet the long-term needs of their customers in the Monterey Peninsula. The proposed project is known as the "Monterey Peninsula Water Supply Project" (MPWSP) and will help meet CalAm's long-term regional water demands, improve ground water quality in the seawater-intruded Salinas Basin, and expand agricultural water deliveries.

Section 2.1 of appendix E1 states that desalination project will improve groundwater quality in the sea water intruded Salinas Basin, and expand agricultural water quality. All of the water produced by the desalination plant is destined for the Cal Am Monterey Peninsula customers. Exactly how will slant well pumping that lowers an aquifer level 44.8 feet help ground water quality, sea water intrusion and Ag water quality?

As part of the investigation phase, a test slant well (northern-most slant well shown on Figure 1) will be constructed and operated at the CEMEX site for a minimum 8 month period or until a stable water quality trend is obtained. This report summarizes results from modeling the test well pumping impacts.

Section 2.1 indicates test well will operate for a minimum of 8 months, page 24 of the DEIR stated that the test well will be up to 18 months, and the Cal Am project schedule shows it running for 24 months. Which is correct? In the same sentence you find the statement "or until a stable water quality is obtained. Where in this document is quality water defined? Where in this document is the stable period length defined?

Finally, nowhere in appendix E1 is there any mention of a disinterested third party expert checking, verifying and agreeing with any of the data presented. It is obvious that Cal Am, and Geoscience have a major financial self interest in the success of this project. Therefore, using information from either of these companies regarding environmental Impact report data should be considered suspect if not rejected outright.