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Sent: Sunday, June 28, 2015 8:56 AM
To: MPWSP-EIR
Subject: Comments on Cal Am's Monterey Penn. Water Supply Project DEIR

June 29, 2015

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Comments on California American Water Company (Cal Am) Monterey Peninsula Water Supply Project Draft Environmental Impact Report

1. Slant well technology for desalinization projects is still experimental. No operating desal plant fed by slant wells exists. Why are we not allowing the time to test this new technology? The final EIR will contain only a few months of data, not enough for the CPUC to make a sound decision. Since this is an experiment that the ratepayers of the Monterey Peninsula are paying for, who will be responsible if this slant well experiment fails?
2. Cal Am has said that it would collect data from its test slant well for a period of 18-24 months. Why is the California Public Utilities Commission scheduled to make a decision with less than 12 months of data? Can Environmental Science Associates explain how such a short time period of data collection can provide the needed basis for judging the impact on ground water? Does this really meet the requirements of CEQA? Why is this decision being rushed and who is responsible for rushing it?
3. It appears there is a conflict of interest that was not made public on this project. Who is responsible for this? Did Environmental Science Associates and the CPUC know that Dennis Williams, President of Geoscience Support Systems Inc, holds the patent on the slant wells that his company was hired to test? How can test data be considered reliable and objective if the president of the company doing the testing stands to profit or benefit from positive test results? The Hydro-geologic Working Group also has a critical role in evaluating slant well data for accuracy and drawing conclusions from its analysis. What is the role of Dennis Williams in that group?