

COMMENT FORM

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

Date: 30 June 2015
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I wish to be added to the CEQA mailing list.

To:

Attn: Andrew Barnsdale
California Public Utilities Commission
c/o Environmental Science Associates
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COMMENTS (due on or before 13 July 2015)

Comments begin on next page.

Moss Landing Alternatives to Cal Am's Proposed Project

From 2004, Nader Agha has been developing plans to build a desal plant at Moss Landing that would provide the potable water needed on the Monterey Peninsula to meet state requirements. He has encountered many obstacles along the way, most of them political. A number of his earlier partners split from him and his "People's" project to develop their own "DeepWater" desal project, also at Moss Landing and featuring open-ocean intake. Local residents have invested millions of dollars in each of these projects. In Sections 7.4.6.2 and 7.4.6.1, the DEIR refers to these two projects only cursorily, claiming neither has been developed sufficiently to merit serious consideration. To support this claim, the DEIR points out in these sections that neither project has even issued an NOP. That is no longer true. DeepWater has issued an NOI and People's an even more advanced NOP. The DEIR has considered portions of these projects as contingent components of its own project but neither alternative project as a whole. Now the EIR must do that, despite the claim that neither of these alternative projects is under CPUC jurisdiction; the EIR must consider each alternative project separately as whole on its own merits. CEQA requires that.

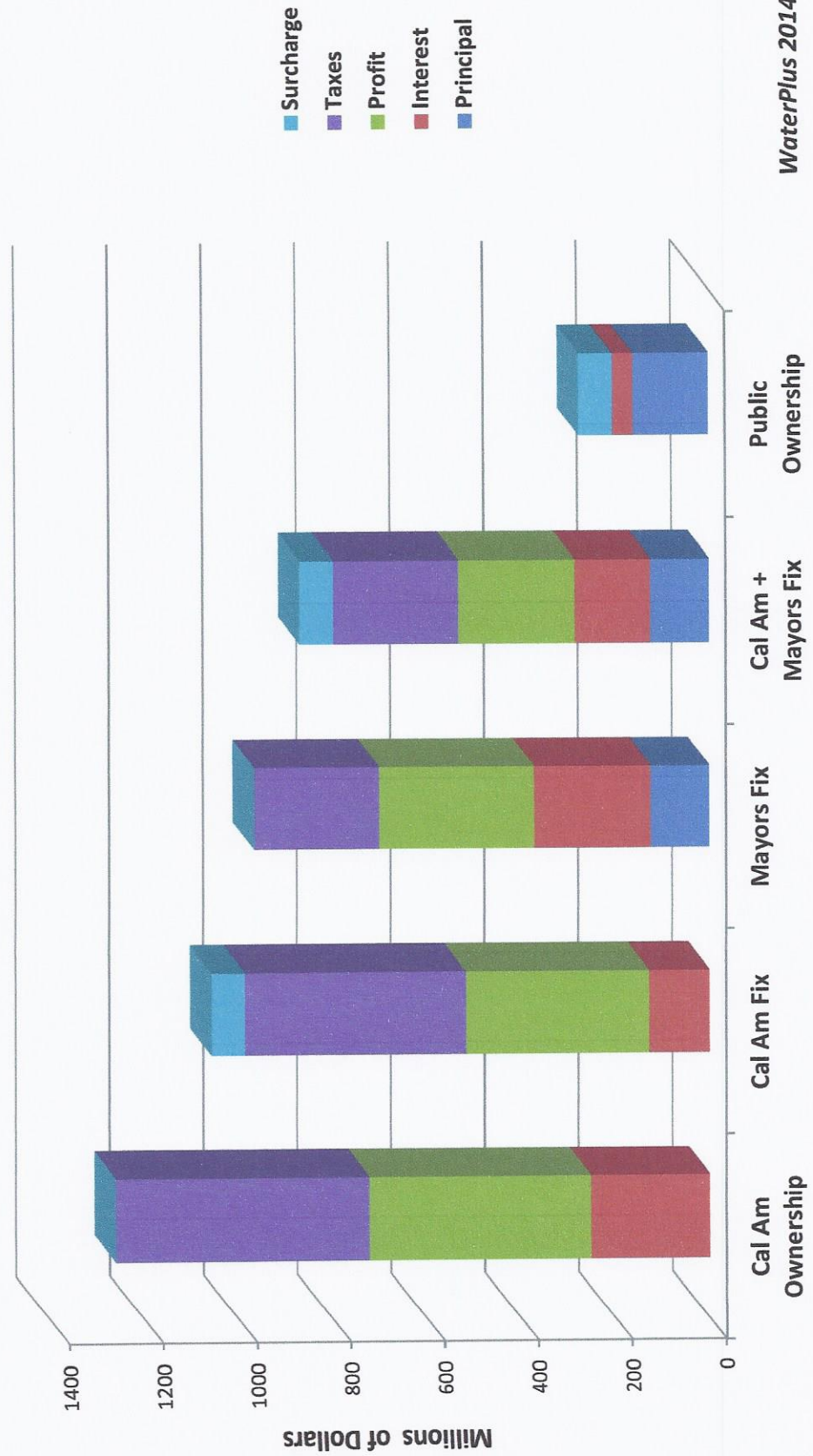
According to CEQA, legal, technological, economic, environmental factors determine the choice of project alternatives. Yet, in Section 7 the DEIR fails to consider economic factors. As potentially publicly-owned projects, People's and DeepWater have a decidedly superior economic edge over Cal Am's project, as the attached graph clearly shows, Cal Am's project being hundreds of millions of dollars more costly to ratepayers than either of the two Moss Landing projects planned for public ownership.

REMEDICATION. As alternatives to Cal Am's project, the EIR should not only consider the People's and the DeepWater projects separately, each as a whole, but also use economic factors in project comparisons, as required by CEQA. The DEIR does neither now.

If you do not take these remediation measures, please explain, Why not?

Monterey Peninsula

DESAL OWNERSHIP SCENARIOS COST TO RATEPAYERS Over Loan Payoff Period



WaterPlus 2014