

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
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COMMENTS (due on or before 13 July 2015)

Comments begin on next page.

Two Non-considered Alternatives Deserving Consideration in the EIR

Two alternatives not considered in Section 7.4 can obviate a number of the project's adverse impacts deemed non-mitigatable. One of these alternatives involves the expansion of the project's GWR component, and the other the selection of a different project site. The first of these alternatives reduces the adverse impact of the substantial carbon footprint of desalination, as well as water-rights and permitting issues, and the other eliminates the adverse impacts of urban pipeline construction and water-rights issues peculiar to the Salinas Valley.

The GWR-only alternative is to use GWR, without desalination, for the entire project. If all four feed-water sources proposed for GWR in its DEIR prove viable, the total amount of source water available could be sufficient to supply up to 14,000 acre-feet of potable water, according to Keith Israel, former general manager of the Monterey Regional Water Pollution Control Agency. That is more than enough to meet the project's goal of somewhat less than 10,000 acre-feet.

As planned now (see ES.5), GWR is only a Cal Am project "variant" if it proves viable in time for the scheduled CPCN. As proposed, the project would consist of desalination only or (the variant) desalination coupled with GWR. The GWR-only alternative is for the project to consist only of GWR while providing all the potable water needed to meet the project's objective. Even if one of the water sources proposed for GWR should fail to prove viable, the GWR-only alternative could likely still meet that objective. The DEIR should include GWR-only as a project alternative.

An alternative involving a different project site is to move the desalination-only project to the vicinity of the mouth of the Carmel River, near an existing waste-water outfall pipeline, like the one near the CEMEX site in Marina. That move would avoid the need to construct the Monterey Pipeline, with all its considerable expense and adverse impacts. It would also avoid the water-rights and permitting issues of drawing water from the Salinas Valley groundwater basin, as well as exporting it out of the basin in violation of the Agency Act.

Siting a desalination-only project near the mouth of the Carmel River may not have appeared feasible when only vertical wells seemed to be the sole possibility for sub-surface intake. Now that Cal Am is proposing the use of slant wells at CEMEX, their use elsewhere, particularly at the mouth of the Carmel River, becomes an alternative that the DEIR should consider, especially since it could avoid serious adverse impacts and water-rights issues of a project sited at CEMEX in the Salinas Valley.

REMEDICATION. The DEIR should be expanded to include the alternatives of a GWR-only water-supply project and a desalination-only project sited near the mouth of the Carmel River. These alternatives could eliminate or reduce some of the adverse impacts of the CEMEX project proposed by Cal Am and deemed to be non-mitigatable for a project sited there. Although a GWR-only project may be outside the purview of the PUC, that is no CEQA reason for failing to consider it as an alternative to Cal Am's proposed project. Both these project alternatives are feasible ways to achieve the basic objectives of the proposed project, while avoiding some of its adverse impacts (Pub. Resources Code, § 21002.1).

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