

From: George Riley <georgetriley@gmail.com>
Sent: Monday, July 06, 2015 4:39 PM
To: MPWSP-EIR
Cc: George Riley
Subject: Comment on DEIR

Public Water Now (PWN) submits this additional comment. I am forwarding an observation made by a local attorney, Jane Haines. She has submitted her comments to CCC and the local Mayor's MPRWA and Technical Advisory Committee.

This comment by PWN relates to the appearance of withholding material information, or the intent to influence from such withholding, or the potential of a conflict of interest, or maybe nonfeasance and neglect, or maybe all of the above. Regardless there is something unprofessional about it.

This is submitted for two reasons and their impacts:

1. The implications of reduced well efficiency observed in that report, and ask ESA to research and respond.
2. The conduct of Mr Williams and Mr Feeney, and ask Mr Barnsdale to investigate.

There was a 2014 Final Report: Technical Feasibility of Subsurface Intake Designs for the Proposed Poseidon Water Desalination Facility at Huntington Beach California, a report authored by the Independent Scientific Technical Advisory Panel (ISTAP) under the auspices of the California Coastal Commission and Poseidon and published October 9, 2014, only 9 months ago at http://www.coastal.ca.gov/pdf/ISTAP_Final_Phase1_Report_10-9-14.pdf.

That report concluded: "Only one slant well has been successfully constructed to date, although a major installation to provide 20 MGD of feed water capacity is under consideration in the Monterey Bay area. The successfully completed well is at Dana Point. When it was built and tested in 2006, it was test pumped at 2000 gpm and displayed a well efficiency of 95%. Recent longer term testing of the completed test well in 2012 documents the reduction in well efficiency from the original value of 95% in 2006 to 52% in 2012 (GeoScience 2012). Given this observed reduction in efficiency over a short period, the long-term performance of the technology has yet to be confirmed." (pg. 37.)

Despite the obvious significance of the 2014 ISTAP report to the Hydrogeology Working Group's duties pertaining to coastal issues for the slant test well project in Marina, to the best of my knowledge the ISTAP findings have never been mentioned in any Hydrogeology Working Group communications, even though Mr. Martin Feeney and Dr. Dennis Williams, authors of the ISTAP findings, belong to the Hydrogeology Working Group.

As water well efficiency decreases, the value of slant wells decreases. This is the problem with no operational experience to draw upon. A decrease of 43% in slant well efficiency over six years reinforces the question of feasibility of slant wells, and the absolute necessity to conduct legitimate long term tests.

In light of the above-quoted-but-so-far-ignored-2014-ISTAP findings, I respectfully request that staff or other party investigate

- 1) the drastic short-term decline in slant well efficiency at Huntington Beach, and its relevance to the Cal Am project;
- 2) if key members of the the Hydrogeology Working Group have been less than forthcoming by not disclosing the 2014 ISTAP report findings.

These questions are of paramount importance for credibility of permitting agencies, and for the proponents and supporters of the MPWSP. I need to add that there is hardly any grant funding for the tests. The ratepayers are paying for all the experimenting, and the impacts from a lack of feasibility discussions in these early stages. The most common experience of ratepayers with Cal Am projects in the past 10 years has been to pay for stranded costs on failed efforts.

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