

# COMMENT FORM

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

Date: 30 June 2015  
Name: Ron Weitzman  
Affiliation: Water Plus (dba Water Ratepayers Association of the  
Monterey Peninsula), president  
Address: 23910 Fairfield Place  
Carmel, CA 93923  
Email address: [ronweitzman@redshift.com](mailto:ronweitzman@redshift.com)

**I wish to be added to the CEQA mailing list.**

To:

Attn: Andrew Barnsdale  
California Public Utilities Commission  
c/o Environmental Science Associates  
[MPWSP-EIR@esassoc.com](mailto:MPWSP-EIR@esassoc.com)

**COMMENTS (due on or before 13 July 2015)**

Comments begin on next page.

## **Slant-well Viability and the Test at Dana Point**

Slant wells like those described in Appendix E-2 and illustrated there in Figures 51-84 have never been used before for desalination. Geoscience Support Services has designed and supervised the construction of one of these wells to test the model predicting the viability of the others, which are intended to draw source water from under the sea for Cal Am's proposed desalination plant. Years ago (2006), the same company had also designed a test slant well at Dana Point. That test well has yet to lead to the development of a desalination plant using slant-wells. A major reason is that after six years of operation its efficiency dropped from 95 percent to 52 percent (Final Report: Technical Feasibility of Subsurface Intake Designs for the Proposed Poseidon Water Desalination Facility at Huntington Beach, California, by CONCUR *Inc.*, October 9, 2014, p. 37). That finding has serious implications for Cal Am's test well. One of the input variables in the model used to evaluate slant-well viability at the site is pump efficiency. An unpredicted substantial drop in pump efficiency over such a relatively short period of time could spell disaster for the proposed desalination project. For this reason alone, use of the model to predict slant-well viability is a risk too large to take without backup data obtained over a period of years.

**REMEDICATION.** Determination of the project's viability cannot rely solely on the model if only because of its dependence of on pump efficiency subject to possible unknown substantial losses over time. The DEIR should contain data supporting slant-well viability collected over a period of years at the CEMEX site. The DEIR contains neither data nor plans to collect data testing slant-well viability there for a number of years prior to the issuance of a CPCN for the project. The CDO deadline is no excuse; Cal Am can pay the fine for failure to meet the deadline over the data-collection period. This DEIR is premature. As planned now, the Cal Am project is headed for a possible, even likely, train wreck because its schedule does not allow for even a small fraction of the time needed for data collection.

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