

## 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.

## Questionable Purpose of Test Slant Well and Interpretation of its Results

In Section 3.4.1.1, the DEIR describes the test slant well as follows: “The test slant well was drilled at 19 degrees below horizontal, is approximately 700 to 800 feet long, and is screened for 400 to 500 lineal feet at depths corresponding to both the Dune Sand Aquifer and the underlying 180-Foot-Equivalent Aquifer of the Salinas Valley Groundwater Basin [SVGB].” Although the intent of using slant wells was to draw water from under the seafloor to avoid accessing water from the SVGB, the test well does not do that. Extending from inland only to the sea’s edge, it draws water directly from the basin’s Dune Sand and 180-foot aquifers (see Figure 64, attached, from Appendix E-2) and, contrary to the Agency Act, exports the groundwater outside the valley into the Pacific Ocean. Cal Am argued to the Coastal Commission that it can do that because the well is only a test well. Yet, the DEIR itself says (pages 3-13 and 3-14), “Upon completion of the pilot program, assuming the results indicate that subsurface slant wells in the CEMEX active mining area could provide a reliable flow of source water for the MPWSP Desalination Plant, the test slant well would be converted into a permanent seawater intake well and operated as part of the proposed project facilities.” That being the case, CEQA requires a full EIR for the test-well-in-name-only as part of the entire proposed project. This well should cease operation until a DEIR modified to include it ultimately receives approval as a final EIR.

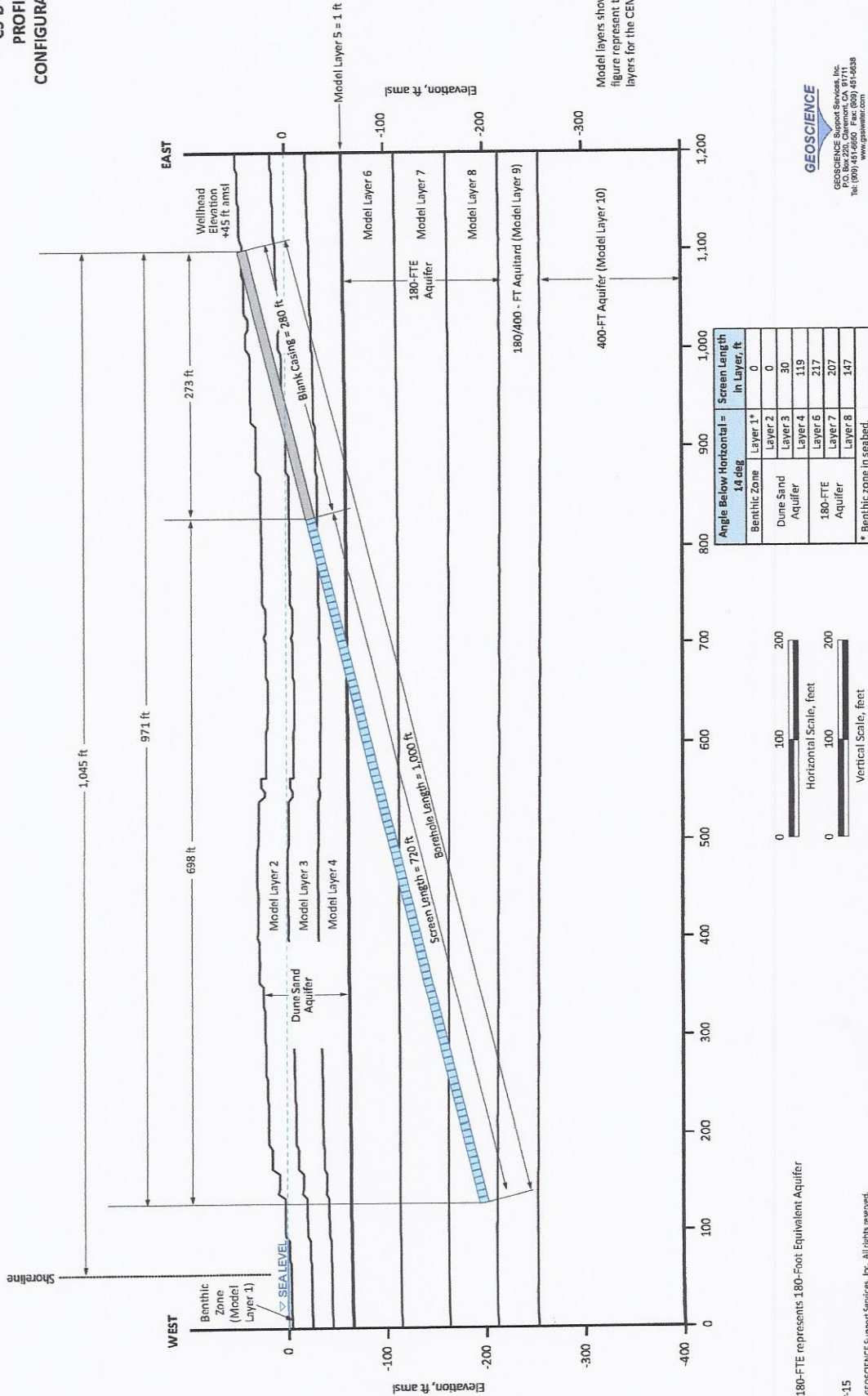
The new DEIR should also make clear just what the test well is testing. It is clearly not testing undersea intakes planned for other proposed wells (see Figures 51-84 in Appendix E-2). Different from these other wells, the test well extends only from inland to the shoreline. So it cannot be a test of an undersea operation. What it apparently is testing is the model in a limited area not under the sea and to a limited depth including the Dune Sand and 180-foot aquifers. As indicated in another Water Plus critique of the DEIR, the model does not apply to the Dune Sand aquifer and inaccurately describes the 180-foot aquifer, mostly making elevation predictions that are too high. That inadequacy and bias is likely at least part of the source of the failure of the model to predict the downward elevation trend that led to the shutdown of the slant well on June 5 (See attached graph). The Hydrological Working Group’s explanation exculpating the test well as the cause of the

drawdown is completely ad hoc, involving grower irrigation patterns unaccounted for by the model that in fact do not exist, the growers using recycled water for irrigation with no cessation on Sundays, as the HWG asserted without checking.

REMEDICATION. Test-well operation should cease until the approval of a final EIR including the test well, which is planned as part of the full project. Rather than testing the model, the test well intake should extend under the sea to test the intake in the region planned for the full operation of the proposed desalination plant. Reliance on data collected over time in the region of planned intake operations rather than reliance on an inadequate and faulty model inappropriately tested will avoid what literally would amount to building a house on sand.

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

CEMEX  
SLANT WELL  
CS-B-4  
PROFILE  
CONFIGURATION B



Model layers shown in this figure represent the model layers for the CEMEX Model

Note: 180-FTE represents 180-Foot Equivalent Aquifer

17-Apr-15

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DRAFT

Figure 64

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### Groundwater Elevation in MPWSP MW-4

