

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
MPWSP-EIR@esassoc.com

COMMENTS (due on or before 13 July 2015)

Comments begin on next page.

Inappropriate Determination of Existing Water Demand

The determination of existing local water demand in Section 2.3.1 is simply an average of local annual water usage over a five-year period from 2007 to 2011. This period is a time of reduced water usage because of conservation pressures growing at an accelerating pace since the state's Order 95-10 and especially since the introduction of the tiered rate structure. Earlier annual usage tended to be closer to 17,000 to 18,000 acre-feet per year than the 13,291 acre-foot average used to determine existing demand in the DEIR.

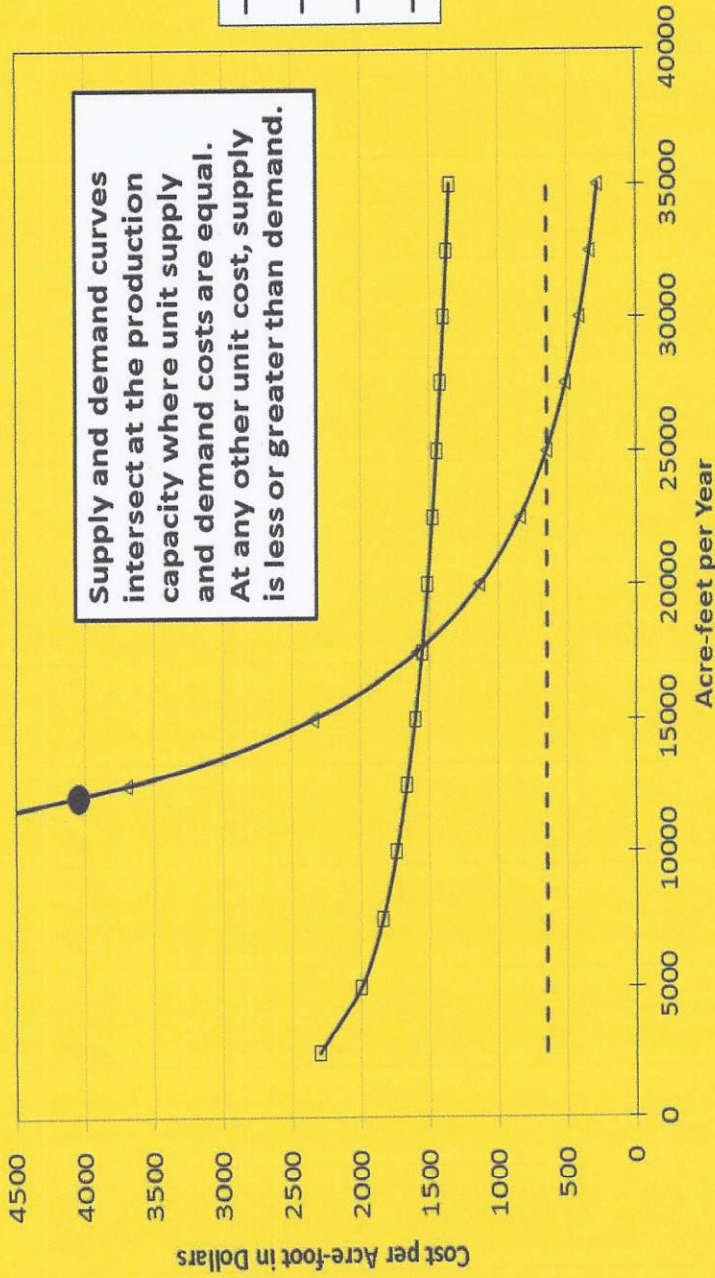
Economists have developed a more accurate method of determining demand that takes cost and supply, as well as demand, into account. All these variables are inter-related, and to omit anyone of them from a demand determination would likely lead to an inaccurate result, though perhaps a politically palatable one. The EIR should use a supply-demand graph like the one attached to determine true existing water demand.

According to this graph, prepared by me, that demand is about 17,500 acre-feet per year, closer to the long-term average and what the more recent average might be in the absence of cost and political pressures.

REMEDICATION. To assure accuracy in the determination of existing demand, the EIR should require the applicant to have a competent economist develop a supply-demand curve to determine local existing water demand. Otherwise, the desalination plant built would very likely provide an insufficient supply of water to meet true existing local demand.

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

WATER SUPPLY & DEMAND on the Monterey Peninsula



WaterPlus 2014

WHAT THIS GRAPH TELLS US

1. The amount we are paying for each unit of water we use is over
 - a. Six times what the average U. S. water customer pays
 - b. Two and one-half times what we could pay for desalinated water
2. If we build a desal plant capable of producing 17,500 acre-feet per year, we could
 - a. Fulfill our entire demand for water, even in a drought year
 - b. Pay less than 40% of what we pay now with no over-supply of water
 - c. Be rid of the tiered rate structure that makes us vulnerable to spiked bills