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Sent: Sunday, June 28, 2015 7:34 PM
To: MPWSP-EIR
Subject: Cal-Am Water DEIR comments

To Mr. Barnsdale or to whom it may concern: June 28, 2015

I am submitting in this correspondence 3 comments along with questions with regard to the proposed Cal-Am MPWSP DEIR.

Comment 1.

In your analysis and determination of water supply and demand as stated in Section 2.6.1 (pp. 2-22 to 2-24) you conclude with the following statement -

"Consequently, it is unlikely that a new analysis of plant capacity requirements that included the two additional years of data would substantially change the proposed sizing of the desalination plant."

Factors that decrease the demand for water by ratepayers include not only the impending effects of CDO-95-10, but most certainly the higher cost of water (due to conservation), installation of water-saving devices (toilets, shower heads, restrictors, etc.), and also changes in behavior and usage patterns. Certainly the latter may increase once a new desal plant is functional, but water-saving devices, and the effects of higher priced water (which is a certainty) should not disappear or diminish much over time. So, the question is, have you taken into consideration these afore-mentioned factors for current or future demand when you selected the sizing of the proposed Cal-Am desal plant (MPWSP)? And if not, why not? I think it is necessary to include these factors in your calculations for future demand and subsequent sizing of the plant. I request you do that. And I definitely think that you should include the most recent data for demand that includes the two most recent years in those calculations (see Table 2-7), since most of the decreased demand over time is due to these other factors I mentioned above. Historically, water use in the Monterey District has exceeded 17,000 AFY and the water use in 2014 was 10,250 AF. This drastic reduction is due mainly to increases in cost and water-saving devices, not because of the CDO. Please reflect this in your calculations for sizing of the desal plant.

Comment 2:

Then, in Section 2.6.3 (pp. 2-26) you state the following:

"The future price of water and how water rates will be structured under the MPWSP is currently unknown. In addition, a future change in water prices under the MPWSP would be accompanied by increased water supply reliability under the MPWSP and, it is assumed, the lifting of constraints imposed by, or to achieve compliance with, SWRCB Order 95-10 and the CDO. Therefore, it would be speculative to make assumptions or draw conclusions as to the effect of the future price of water on the behavior of service area customers, especially considering the relatively low levels of water use in CalAm's Monterey District service area (compared to elsewhere in the state), and the area's long history of conservation."

I would disagree with the first sentence of this statement, because what we do know is that water will definitely be more expensive if the MPWSP is built. Wouldn't you agree? If not, is there any scenario in which you believe that the future cost for water will actually go down or remain stable? Please describe such a scenario.

Also, you seem to want to assume that the water supply will be more reliable, but how do you know that, particularly if you consider the speculative nature of untested slant wells? You're assuming reliability with no

basis in fact to refer to. Or do you have a basis for reliability, and if so, please disclose it. And you also seem to rely once again on the effects that lifting the CDO may have on water demand, but fail to consider the longer-lasting effects of water-saving devices and the higher cost of water. Will you please offer some hard data (such as a study) on the effects that water-saving devices and the higher cost of water have had, or will have, on overall demand, particularly since the law of supply and demand is reversed when dealing with a CPUC regulated utility because the less demand there is for water, the higher the subsequent cost per unit.

Comment 3.

Beginning in Section 7.11.1 No Project Alternatives (pp.181 and continuing), regarding your analysis of the two "No Project" alternatives I don't see anything regarding 'rainwater capture & storage' or 'graywater reuse'. These two methods of water use reduction should be included in your analysis. Why are they not included? I would like to see them included in these "No Project" alternatives and elsewhere in this DEIR. Will you add them to your analysis? These two methods for lowering water use are currently in use by many ratepayers, and there is ample opportunity for expanded implementation by homes and businesses. This would decrease overall demand, obviously.

Thank you for your consideration,
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