Th3a & 4a

A-4-MRA-19-0034 / 9-19-0918

California-American Water

OPPOSED LETTERS

Packet 2
Updated
September 9, 2020

Luster, Tom@Coastal

From: Louise Berry <plberry850@comcast.net>
Sent: Wednesday, September 09, 2020 2:03 PM
To: CalAmMonterey@coastal
Subject: PLEASE HEAD THE RECOMMENDATION OF YOUR STAFF

Dear Commissioners,

I have been following the plight of water shortages in Monterey County for the past 14 years. Cal Am has again sent out large postcards to every member of our community with false information - this should be illegal.

We need water, but we don't need this desal plant. There is a far better alternative. Expanding the Pure Water Monterey project is the most cost-effective and environmentally sound solution. This alternative is one of the main reasons the Coastal Commission staff recommends against Cal Am's desal.

Thank you,

Louise C Berry

24 Yerba Buena Ct

Seaside CA 93955

age 80 and of sound body and mind.

Luster, Tom@Coastal

From: Patricia Eastman <peastman38@yahoo.com>
Sent: Wednesday, September 09, 2020 1:53 PM
To: CalAmMonterey@coastal
Subject: Deny CalAm's Desal project

Dear Commissioners,

Please vote to DENY Cal Am's Desal project. It will be a environmental disaster and will lead to even more expensive water.

Please vote in accordance with the staff recommendation.

Sincerely,
Patricia Eastman

Luster, Tom@Coastal

From: Bill Bruffey <bbruffey39@gmail.com>
Sent: Wednesday, September 09, 2020 1:52 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal project

Commissioners:

Please vote per staff recommendation. Vote to DENY Cal Am's desal project. We do not need a desal plant and we do not need higher water costs!

Sincerely,

Bill Bruffey

Luster, Tom@Coastal

From: Sheila Clark <saclark63@gmail.com>
Sent: Wednesday, September 09, 2020 1:21 PM
To: CalAmMonterey@coastal
Subject: California American Water Co. Project Application #9-19-0198

Dear Commissioners:

I am writing to urge you not to approve the above Project as recommended by the Coastal Commission's Staff Report. I am a resident of Seaside living on a fixed income. As a Seaside resident, I have gone to great lengths to conserve water, however, my water bills continue to rise. Cal-Am has been able to increase its rates regardless of poor management, failed projects, and even reimbursed for water not used by ratepayers. This is in addition to being paid a 10% profit. A large population of Seaside residents live in low income households. Many of these households are living below the 200% poverty level. For many of these ratepayers, increased costs of housing, job insecurity, and **rising water rates**, may make it impossible for them to continue living in Seaside. Affordable housing is not possible without affordable water. If people cannot afford to live in Seaside, the local economy will suffer. Needing to decide whether to pay rent, buy groceries, medicines, or water is an **economic injustice**.

The Cal-Am Project is not necessary. The expansion of Pure Water Monterey provides a long-term sustainable water source. Cal-Am's desalination water project would cost $6,000-$8,000 per acre foot. The alternative Pure Water

Monterey Project purified recycled water will be less than half that cost. Pure Water Monterey is now operational. In addition, ratepayers would be subsidizing desalination water for Castrollvile. Castroville would be charged $110 per acre foot. Consequently, we would pay a subsidy of $5 million a year. Seaside ratepayers cannot afford this.

In making a decision to approve or disapprove this project, I urge you to look at the economic injustice as well as the environmental injustice of this project.

Again, I urge you to look out for the greater good of our local communities and **disapprove** this project.

Sincerely,
Sheila Clark

Luster, Tom@Coastal

From: Nick Denning <nickdenning@hotmail.com>
Sent: Wednesday, September 09, 2020 12:45 PM
To: CalAmMonterey@coastal
Subject: Marina desalination plant

Mr. John Ainsworth,

Good afternoon. I am a concerned citizen of Marina CA. I work on Dunes Drive.

My concern is for the city and it's people. Can you please explain to me how Marina benefits from this desalination plant? As far as I know our water supply is stable & has been even when the Army was taping into it.
As of this moment I would urge you to decline the project permit until at the very least, a deal is stuck that benefits our city and people and offsets the damage to our beautiful beaches, Dunes, and the fragile ecosystem.

Again, please halt or deny thus project.
If not please provide information as to how this directly benefits us.

All the best,
Nicholas Denning

Luster, Tom@Coastal

From: Nancy Selfridge <self48@icloud.com>
Sent: Wednesday, September 09, 2020 12:06 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am Desal Project

Dear Costal Commissioners,
After being involved in water issues for the past 14 years, I am very pleased with your staff's decision. It is exactly correct. For all of the reasons listed the Cal Am desal project will never work. Their goal is to charge the ratepayers the maximum amount of money that they are allowed.Thankfully your staff saw through their mistakes and subterfuge. Please vote with the staff report and deny the Cal Am project.
Sincerely,
Nancy Selfridge
Former Monterey City Council Member

Sent from my iPhone

Luster, Tom@Coastal

From: James Dorsey <whalekeeper@yahoo.com>
Sent: Wednesday, September 09, 2020 10:52 AM
To: CalAmMonterey@coastal
Subject: Stop Cal AM
Attachments: Stop CalAm.jpg

Dear Director, Ainsworth,

Cal AMs' plan for slant wells in Marina will devastate our beach, wipe out an endangered species, and take precious water from its rightful source.

I moved to Marina to enjoy my life; not to have it fouled by greed for profits over the health of us local people.

Vote against Cal Am.

James and Irene Dorsey
268 10th St. Marina Ca. 93933

Luster, Tom@Coastal

From: Kathryn Varner <k-varner@sbcglobal.net>
Sent: Wednesday, September 09, 2020 10:51 AM
To: CalAmMonterey@coastal
Subject: Cal Am Desalination

Please deny their expensive proposal.
We are paying out of pockets the most expensive rates in the entire country and this entirely is a risk that is not needed.

Kathryn Varner
Pacific Grove ,CA 93950

Luster, Tom@Coastal

From: Howard Kranther <hkranther@hotmail.com>
Sent: Wednesday, September 09, 2020 10:50 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Howard Kranther.
I am a resident of East Garrison, CA, and I am a customer of Marina Coast Water District.
I am a retired computer programmer.

I have read the Summary of Staff Recommendation regarding the application by California American Water Co. to build and operate slant wells and a desalination plant near Marina, CA.
I agree with the staff recommendation to deny the project.

This project will cause unfair economic hardship to residents of the area.
It will harm the local environment.
Cal Am has proven to be a poor steward of Monterey Peninsula's water supply in the past.
Recycled water provided by Monterey One Water is a better, less costly, and more just way to provide water to the Central Coast at this time.

Please deny this project!

Thank you,

Howard Kranther
East Garrison

Luster, Tom@Coastal

From: Lynn Gmail <lynnhmltn@gmail.com>
Sent: Wednesday, September 09, 2020 10:07 AM
To: CalAmMonterey@coastal
Subject: Deny Cal Am desal

Dear Coastal Commissioners,

The much better solution for the water we need in the Monterey area is to expand Pure Water Monterey. It is feasible, less costly and less environmentally damaging. I don't want my money going to a huge, non-local corporation that uses deception to make big profits. I heard yesterday, from a friend who lives in Seaside, that CalAm has just sent out very misleading Information to Seaside residents, in an attempt to get support for the desal project in Marina.
We need to be fair to all local communities, and treat water as the precious, vital life-sustaining resource it is!
Thank you for your attention,

Lynn Hamilton
Monterey, CA

Luster, Tom@Coastal

From: Suzette Cavanaugh <suzettecavanaugh@gmail.com>
Sent: Wednesday, September 09, 2020 10:02 AM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

This project is not in the public interest and there is an environmentally superior alternative in the expansion of Pure Water Monterey.

I read the entire Coastal Commission's Staff Report that recommends denial of Cal Am's Desal. For all of the reasons stated in your Staff's Report, please vote with your Staff and deny Cal Am's desal project.

Thank you.

Sincerely,

Suzette Cavanaugh Singer
1861 Yosemite Street
Seaside, CA 93955
821-920-1136

Luster, Tom@Coastal

From: Charles <pecher38@comcast.net>
Sent: Wednesday, September 09, 2020 10:00 AM
To: CalAmMonterey@coastal
Subject: desalination plant

CalAm is a German company and all its proceeds are returned to Germany.

I don't agree that a foreign investor should have control or say over our national resources.

If Monterey, Seaside or other cities on the Peninsula want a desalination plant then build one on your ocean site because the last time I looked I saw that the they have the same ocean shores as Marina.

Maria A. Baker

Luster, Tom@Coastal

From: Белый Парус <mb6kp9@gmail.com>
Sent: Wednesday, September 09, 2020 9:43 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff,

My name is Stephen Corbett and I am a resident of the city of Marina. My wife and I have lived and worked on the Monterey Peninsula for more than a decade. She is a teacher at the Defense Language Institute and I am a disabled Navy Veteran who is not only a graduate of DLI but also taught Russian there and currently work for a local agency assisting homeless and other struggling Veterans. We believe that the CalAm project is harmful not only to our environment but also to the people of our city. Thank you for your time and we hope for the best outcome for all of us in Marina at the Special Meeting on 17 September.

Please deny the CalAm Slant Well project!

Very respectfully,

Stephen Corbett

Luster, Tom@Coastal

From: Brian McCarthy <brianmm80-solarua@yahoo.com>
Sent: Wednesday, September 09, 2020 9:09 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear California Coastal Commissioners, Executive Director John Ainsworth and staff,

Please deny the harmful CDP for this project.

I've spend the last several years using my available free time trying to educate myself, neighbors and community leaders about the real harm this project will create for the disadvantaged community of Marina. As if our community wasn't struggling enough, this potential knockout blow comes at a time we are least prepared to defend against it. The scars of having to defend against this threat will be long lasting, however I believe our strong community will be up for the challenge each and every time.

Thank you for all the work you do defending the California Shoreline and the people who appreciate it.

Please deny the CAL-AM project.

Respectfully,

Brian McCarthy
Resident of Marina

Luster, Tom@Coastal

From: Merphant Babnoggle <nomarbushes@comcast.net>
Sent: Wednesday, September 09, 2020 8:44 AM
To: CalAmMonterey@coastal
Subject: Proposed California-American Desalinization Plant

There are environmentally superior alternatives to the "desal" plant proposed by Cal-Am. I urge you to deny this project.

B. Graybill
Monterey, California

Luster, Tom@Coastal

From: Linda K <cvgal99@gmail.com>
Sent: Wednesday, September 09, 2020 8:42 AM
To: CalAmMonterey@coastal
Subject: Water Price

Please reduce our super high water prices, they are much higher than anywhere else with no good reason. Tired to being ripped off by something that SHOULD be a public utility and instead is a company that is taking advantage of the residents who are effectively held hostage to these excessive water rates!

Sincerely,

Linda Killa28 Paso Hondo
Carmel Valley, CA

Luster, Tom@Coastal

From: msimmons@fujitsu.com
Sent: Wednesday, September 09, 2020 8:14 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit
Attachments: 029.JPG

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:-

My name is Mark Simmons.
I have lived in the lovely beachside location of Marina for over four years now and have seen little to spoil the area.
I now work 100% from home due to COVID-19 restrictions and get out onto the beach as often as I can with my wolf dog Chewie.

The beach is his happy place (& mine) & we go almost daily.

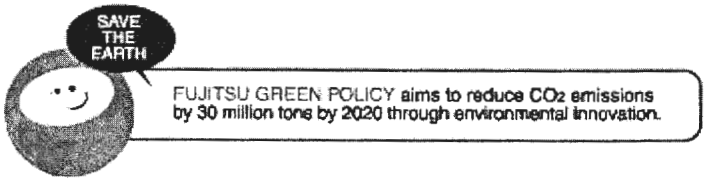
After visiting Israel & seeing a de-salination plant in action (Sorek – Red Sea coast) with its noise, dust, 24x7, the thought of a large de-salination plant on the beach right here just really really annoys me.
Compounding this is that the water from it isn't even intended for Marina's use as I understand things.... Where is the irony in that? Where is the social justice?

Please make the right decision for Chewie, myself & the other great inhabitants of this quaint small town – please deny the CalAm de-salination project!

Many thanks for your attention & consideration.

Kind regards / Mit freundlichen Grüßen / 敬具/ Maligayang pagbati / よろしくお願いします/أطيب التحيات
Mark K.R. Simmons, B. Sc(Hons), DIS, MBCS
CTO, Platform Products Group
Fujitsu America, Inc.

Upcoming absence(s):-
Corporate Mobile (669) 224-0152
Personal Mobile (408) 674-7047
E-mail: msimmons@fujitsu.com



http://www.fujitsu.com/global/about/environment/

Luster, Tom@Coastal

From: DEBORAH WALDRON <dewal@comcast.net>
Sent: Wednesday, September 09, 2020 8:10 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Attn: CA Coastal Commissioners, Executive Director Ainsworth & Staff

I am an African-american resident of Marina for 42 years. I strongly urge you to deny this environmentally harmful project to our area. Thank you.

/daw

Luster, Tom@Coastal

From: Barbara Haney <barbarina394@att.net>
Sent: Wednesday, September 09, 2020 6:30 AM
To: CalAmMonterey@coastal
Subject: Cal Am Desal Project

Please do NOT APPROVE CAL AM'S DESAL PROJECT. WE DON'T NEED IT LETS STOP THIS UNNEEDED, OVER-PRICED, AND ENVIRONMENTALLY DAMAGING PROJECT.
BARBARA HANEY
EDWARD HANSON
1375 PLUMAS AVE
SEASIDE, CA 93955

Sent from Mail for Windows 10

Luster, Tom@Coastal

From: zsopa@aol.com
Sent: Wednesday, September 09, 2020 6:22 AM
To: CalAmMonterey@coastal
Subject: Desal plant

There was an old law in Monterey County that stated that any desal Plant had to be publicly owned. Two Monterey County supervisors took it upon themselves to change that rule in secret meetings with Cal-Am.
Look at Monterey Herald article "Follow the Money but keep it a secret" dated August 25, 2013..

Luster, Tom@Coastal

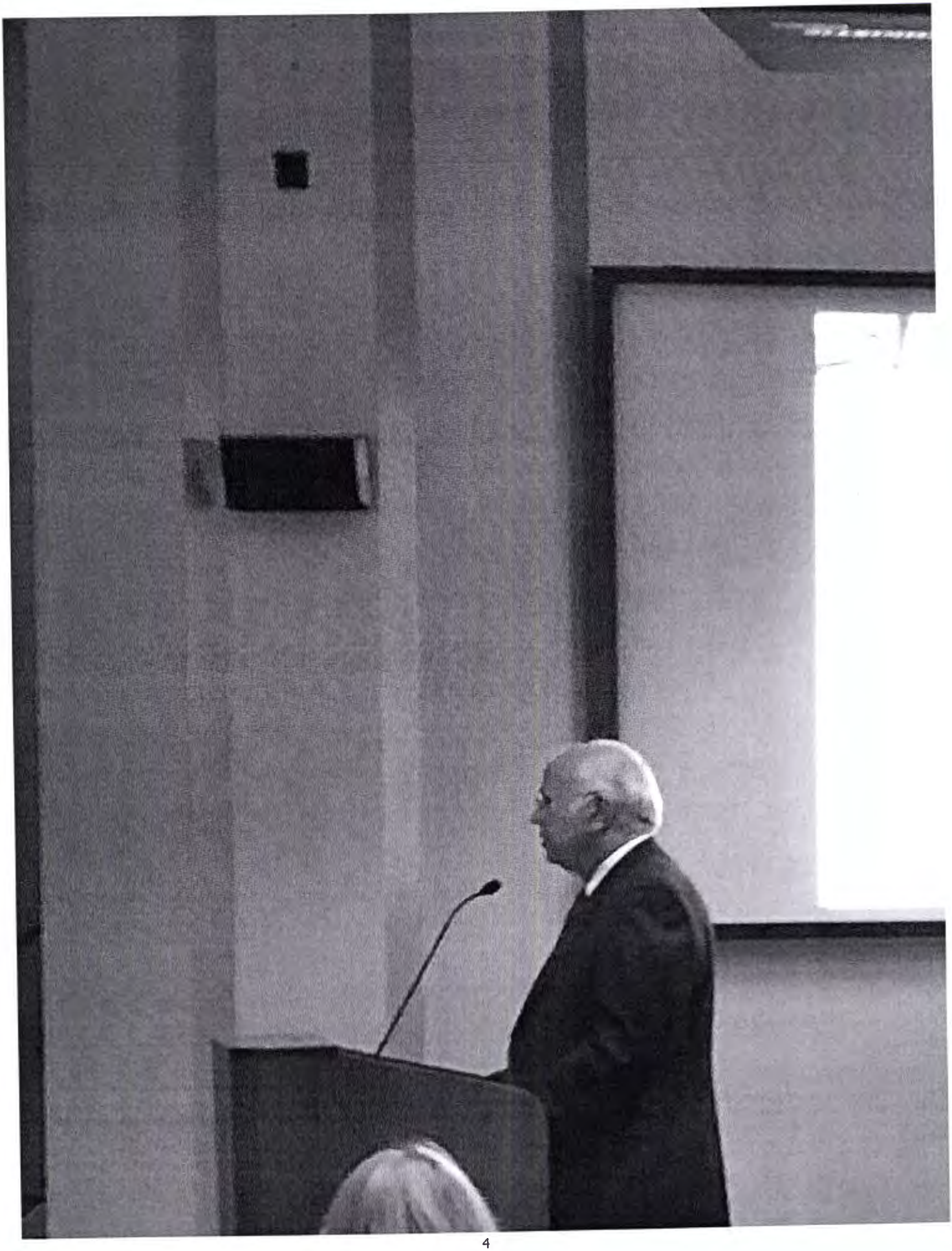
From: Liesbeth Visscher <liesbethvisscher@yahoo.com>
Sent: Tuesday, September 08, 2020 11:50 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:


COMMUNITY
ROOM
Source: Aquifers Subject to Years of Seawater Intrusion

My name is Liesbeth Visscher. I grew up in the Netherlands and 25 years ago moved to California, together with my husband. Three years ago, soon after moving to Marina, we attended a "Water Forum" hosted by Citizens for Just Water. When we learned about the threat to the aquifers and coast we became involved.

I would like to give you **one example** of the unfair challenges that we have had to endure while fighting a private deep-pocketed company. To attend a CPUC meeting in September 2018 a car with five volunteers left Marina at 5 AM in order to arrive on time in San Francisco. We each had prepared our 3-minutes public comments. When we filled out the speaker slips we found out that we had to limit our comments to ONE minute. Just when the meeting was about to start two buses showed up at the entrance, filled with mostly men in suits. At the end of the public comments period anybody who hadn't filled out a speaker slip was allowed to line up and give a one-minute comment. All those business people spoke in favor of CalAm's MPWSP. The CPUC approved the permit, the CalAm supporters were picked up by the buses and we heard that they celebrated with champagne on the way home. Meanwhile, we walked a few blocks to pick up our car, paid a small fortune for parking, and on the way home stopped for lunch – which we of course paid for ourselves.



I fortunately can afford to take days off from work and pay for gas to travel to meetings. Please know that many people in Marina cannot afford to do this. We feel simply overrun by CalAm. Since we now can't attend meetings in person we have taken many photos of residents trying to show you how diverse Marina's population is and that all those people are asking you to protect our water source and beach, and to **please deny the Slant Well project!**

Signed,
Liesbeth Visscher,
Resident of Marina, CA.

Luster, Tom@Coastal

From: Marilyn Mason <mason.marilyn@yahoo.com>
Sent: Tuesday, September 08, 2020 11:40 PM
To: CalAmMonterey@coastal
Subject: Please deny Cal Am's Desal Project

I am against Cal Am's project because Pure Water Monterey – Phase 1, now in operation, will give us the additional water we need to stop illegal diversions from the Carmel River by the December 2021 deadline. Expanding Pure Water Monterey would give us the water we need for growth. And it would lift the moratorium much sooner than Cal Am's desal.

After December 2021, only 3,376 acre-feet (AF) of water can be legally taken from the river. But because of the 3,500 AF of new water available from Pure Water Monterey, we can meet that deadline with a surplus. This will stop the illegal withdrawals and protect the River. The decades long environmental problem on the Carmel River will be solved. But to meet the requirements of the Cease and Desist Order (CDO) and the CPUC imposed moratorium, we would need an additional water supply like the expansion of Pure Water Monterey.

If the Pure Water Monterey Expansion of 2,250 AF were added to the current 3,500 AF from Pure Water Monterey – Phase 1, along with our legal River withdrawal of 3,376 AF and other available sources, the total available would be 11,700 AF. We only use 9,825 AF annually. That would lift the CDO and give us 1,875 AF of surplus water for growth. If history is any indicator this will give us enough water for a minimum of 20 to 30 years.

Marilyn Mason
Seaside, CA

Luster, Tom@Coastal

From: Gloria McKee <gloria.mckee@gmail.com>
Sent: Tuesday, September 08, 2020 11:39 PM
To: CalAmMonterey@coastal
Subject: Deny

We are economically disadvantage community. Many of our long time residence are widowed of U. S. army veterans, I am one of those affected individuals who can't afford to be swift into Cal Am customer base if they compromise our limited water supply. Cal Am is unaffordable and unwanted by our community let them take their exploitative slant well technology elsewhere on their own customer base.

Luster, Tom@Coastal

From: Emily Zefferman <ezefferman@gmail.com>
Sent: Tuesday, September 08, 2020 10:53 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

To the California Coastal Commissioners, Executive Director, and staff:

As a resident of Marina who cares about the long-term sustainability of our water supply and the coastal environment, **I encourage you to DENY CalAm's permit for their proposed desalination plant in Marina**.

I agree with the staff report that found that the Pure Water Monterey expansion is a viable and preferred alternative to meet the water use needs of the Monterey peninsula, and that this desal plant would pose an environmental injustice to the citizens of Marina who would not receive water from this project but would potentially bear the burden of a contaminated water supply and degraded beaches.

Thank you for considering my statement,

Emily Zefferman

Luster, Tom@Coastal

From: Ray Bennett <yarbennett@gmail.com>
Sent: Tuesday, September 08, 2020 10:53 PM
To: CalAmMonterey@coastal
Subject: Public Comment on September 2020 Agenda Item undefined 3a - Appeal No. A-3-MRA-19-0034 (California American Water Company, et. al., Monterey Co.)

The proposed Cal-Am desalinization project is unnecessary and is an incredibly expensive ruse to increase their return on investment. The Pure Water Monterey project is a much preferable alternative to building a billion dollar desalinization facility that will cause irreversible harm the surrounding environment. Additionally, but the pipeline needed for transporting the water along with its installation will harm wildlife that is already under considerable pressure.

The proposal to offer water to the community of Castroville at reduced rates is offensive to those of us who are water users in other communities. If this is allowed to proceed, once again we will see another huge increase to our water bills on top of all the other rate increases and fees we currently are forced to pay. We already pay one of the highest, if not the highest, water rates in the entire country.

If the proposed facility is allowed to continue, complicated and expensive litigation over water rights will ensue and will last for many years. One effect of this Litigation is that it will postpone the reduction of water taken from the Carmel River.

I was once a supporter of Cal-Am and understand they are in the business of creating return on their shareholders' investments. However, I have changed my opinion of Cal-Am and now see them as tyrant that will do anything to increase return including building an expensive desalinization plant so they will be guaranteed nearly a ten percent return on their billion dollar investment. This begs the question, why is Cal-Am guaranteed such an obscenely high rate of return? As an individual, I feel fortunate if I can get a two percent return on my investments.

Please follow your staff's recommendations and deny all of Cal-Am's appeals and permit applications.

Thank you,

Ray Bennett
Seaside, CA

Luster, Tom@Coastal

From: Mario <mario636@yahoo.com>
Sent: Tuesday, September 08, 2020 10:28 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project.

Dear Commissioners of the California Coastal Commission,

My family lives in Marina in Monterey county. We are very afraid of the environmental impact the desal plant will have on our water and environment. We ask that you deny the proposed Desal Project.

We need water in the Monterey Peninsula area, but we don't need to have this desal plant. There is a far better alternative. Expanding the Pure Water Monterey project is the most cost-effective and environmentally sound solution. This alternative is one of the main reasons your Coastal Commission staff recommends against Cal Am's desal.

This project is not in the public interest and there is an environmentally superior alternative in the expansion of Pure Water Monterey.

Sincerely yours,
Mário Flores
Homeowner, Taxpayer, Voter.
Marina, CA 93933

Sent from my iPhone

Luster, Tom@Coastal

From: veruka salt <msverukasalt@gmail.com>
Sent: Tuesday, September 08, 2020 10:09 PM
To: CalAmMonterey@coastal
Subject: Desal

Dear Commissioners,

I am asking you to deny Cal Am's desal permit.
In reviewing the material regarding this project, it is very clear that it is not in the public interest.
the expansion of Pure Water Monterey is a superior alternative financially and environmentally.
Thank you,
Sandra Dee

Luster, Tom@Coastal

From: Ulrika Bjorkman <ubjorkman@hotmail.com>
Sent: Tuesday, September 08, 2020 9:27 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Ulrika Bjorkman-Stiller and I live in Marina California. I absolutely love my city and enjoy walking on the Marina Dunes trails and beaches each and every week. My son enjoys looking for bugs and lizards on the trails here. We love watching the ocean waves and seeing the birds thriving here in Marina. Something that is becoming less common these days. We immigrated here from Sweden years ago, a country that takes pride in protecting its environment. I hope we can too.

I DO NOT want CalAm to build slant wells on Marina's beach and to take groundwater to which they have no rights! Not a drop of that water will benefit Marina, it will be sold to CalAm's customers on the peninsula. This project will harm our water source!

PLEASE DENY THIS HARMFUL PROJECT!!

Please!
Thank you,

Ulrika Bjorkman-Stiller

Sent from my iPhone

Luster, Tom@Coastal

From: wiskoff@aol.com
Sent: Tuesday, September 08, 2020 9:15 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

Dear Commissioners:

It's time for Monterey Peninsula water ratepayers to get rid of California American Water. Cal Am has spent 25 years — without success but consistently increasing our water bills nevertheless — supposedly trying to solve our water supply problem. We know that Cal Am cannot be trusted, and passing Measure J was our declaration of independence from corporate greed at our expense.

Thanks to our Monterey Peninsula public agencies, all the water we need for decades is now available through Pure Water Monterey and the Pure Water Monterey Expansion — but Cal Am is blocking it in favor of its own over-sized, over-priced desal project.

Cal Am's desal project is not in the public interest: It would double our water bills, leading to a decrease in the supply of affordable housing. It would damage the environment by harming our coastal habitat and Marina's beautiful dunes. It has no legal source water and would draw NOT ocean water but groundwater from an already over-drafted groundwater basin.

The argument that desal is needed to solve a Carmel River crisis has no basis in fact. Our current water supply from Pure Water Monterey (Phase 1: 3,500 acre-feet) will allow us to stop illegal withdrawals from the Carmel River by December 2021. Our current water supply will restore the Carmel River and protect the steelhead. The environmental issues facing the Carmel River have been resolved by Pure Water Monterey without the need for Cal Am's desal.

The Pure Water Monterey Expansion is the feasible and environmentally preferable alternative to desal. It will give us a new water supply much sooner than Cal Am's project. It will provide a long-term sustainable water supply for decades of growth while supporting affordable housing and economic recovery.

The Pure Water Monterey Expansion's source water is primarily the 8,000 acre-feet of excess wastewater that is now discharged into Monterey Bay. It is contractually secure and drought proof. It avoids environmental damage to our wondrous coastline and avoids environmental injustice to our citizens.

Cal Am is the only obstacle to the Pure Water Monterey Expansion. We have been Cal Am ratepayers since 1987, and we respectfully ask you to deny CalAm's desal project.

Sincerely,

Martin & Karen Wiskoff
Monterey, CA

Luster, Tom@Coastal

From: Roberta L. Durand <rlengstrom@gmail.com>
Sent: Tuesday, September 08, 2020 8:53 PM
To: CalAmMonterey@coastal
Subject: Vote No on CalAm Desal

To whom it may concern:

I urge you to protect Marina's groundwater by voting NO on CalAm's desal project in Marina.

Thank you.
Roberta Durand

Luster, Tom@Coastal

From: kathy west <tasker928@hotmail.com>
Sent: Tuesday, September 08, 2020 8:26 PM
To: CalAmMonterey@coastal
Subject: Subject – Deny Cal Am's Desal Project

Please deny CalAm's Desal Plant. It is not in our best interest and will only raise our already too high water prices (we are still the #1 most expensive water in the USA by far) with a project that is not necessary, as we can meet our needs via expanding Pure Water Monterey's project. Not only is the desal overkill and burdensome to water users in the Peninsula, but it just doesn't make sense when we can get all the water we need via PWM for years to come.

I did not purchase a home in this area thinking that I'd need to go to a laundromat to wash my clothes since it's unaffordable to do so anymore in my home. I conserve as much as I possibly can but still can't afford my monthly bill!

I'm pleading with you- please don't allow CalAm to build the Desal Plant!

Karen Wood
Carmel Valley Resident

Luster, Tom@Coastal

From: Evan Asuncion <21003@gopalma.org>
Sent: Tuesday, September 08, 2020 8:17 PM
To: CalAmMonterey@coastal
Subject: Re: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

On Tue, Sep 8, 2020 at 8:16 PM Evan Asuncion <21003@gopalma.org> wrote:
Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Evan Asuncion and I am a resident of Salinas. I have lived in Salinas my whole life and I attend Palma school. At Palma, I am enrolled in the AP Environmental Science class. In this class, we have and are learning how to be the best stewards we can be for our world. If the Desalination project is approved, it will leave many coastal habitats and animals, such as the Snow Plover at risk. Also it will ultimately contaminate the regional ground water supply. I hope that you will make the right decision for the Marina Community.

Please deny the CalAm Slant Well project!

Signed,
Evan Asuncion

Luster, Tom@Coastal

From: Evan Asuncion <21003@gopalma.org>
Sent: Tuesday, September 08, 2020 8:17 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Evan Asuncion and I am a resident of Salinas. I have lived in Salinas my whole life and I attend Palma school. At Palma, I am enrolled in the AP Environmental Science class. In this class, we have and are learning how to be the best stewards we can be for our world. If the Desalination project is approved, it will leave many coastal habitats and animals, such as the Snow Plover at risk. Also it will ultimately contaminate the regional ground water supply. I hope that you will make the right decision for the Marina Community.

Please deny the CalAm Slant Well project!

Signed,
Evan Asuncion

Luster, Tom@Coastal

From: Sbc <lindymarrington@sbcglobal.net>
Sent: Tuesday, September 08, 2020 8:08 PM
To: CalAmMonterey@coastal
Subject: Re: Deny Desal Plant

My name is Lindy Marrington and a long time inhabitant of Carmel. I studied Marine Biology at UCSC and we learned about desalinization. It is a very inefficient and damaging process. Please vote no on the desal plant!

Thank you,

Lindy Marrington

Luster, Tom@Coastal

From: Gwyn De Amaral <califwayoflife@aol.com>
Sent: Tuesday, September 08, 2020 7:58 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am Desal

Dear Coastal Commissioners ,

As a homeowner and Carmel Highlands resident, I urge you strongly to listen to your staff and **deny** the Cal Am's Desal plant.
We hear so much about affordable housing and coastal access but for some reason no one ever mentions affordable water. No matter how much we conserve, our water bill and its surcharges continue to rise. At the same time, this is now determining our decision to stay in the area.
I am a fifth-generation Monterey County resident, and, sadly, it's come to this. It is factoring in Cal Am water cost in my retirement. The project is not in the public interest, and there is an environmentally superior alternative in the expansion of Pure Water Monterey.

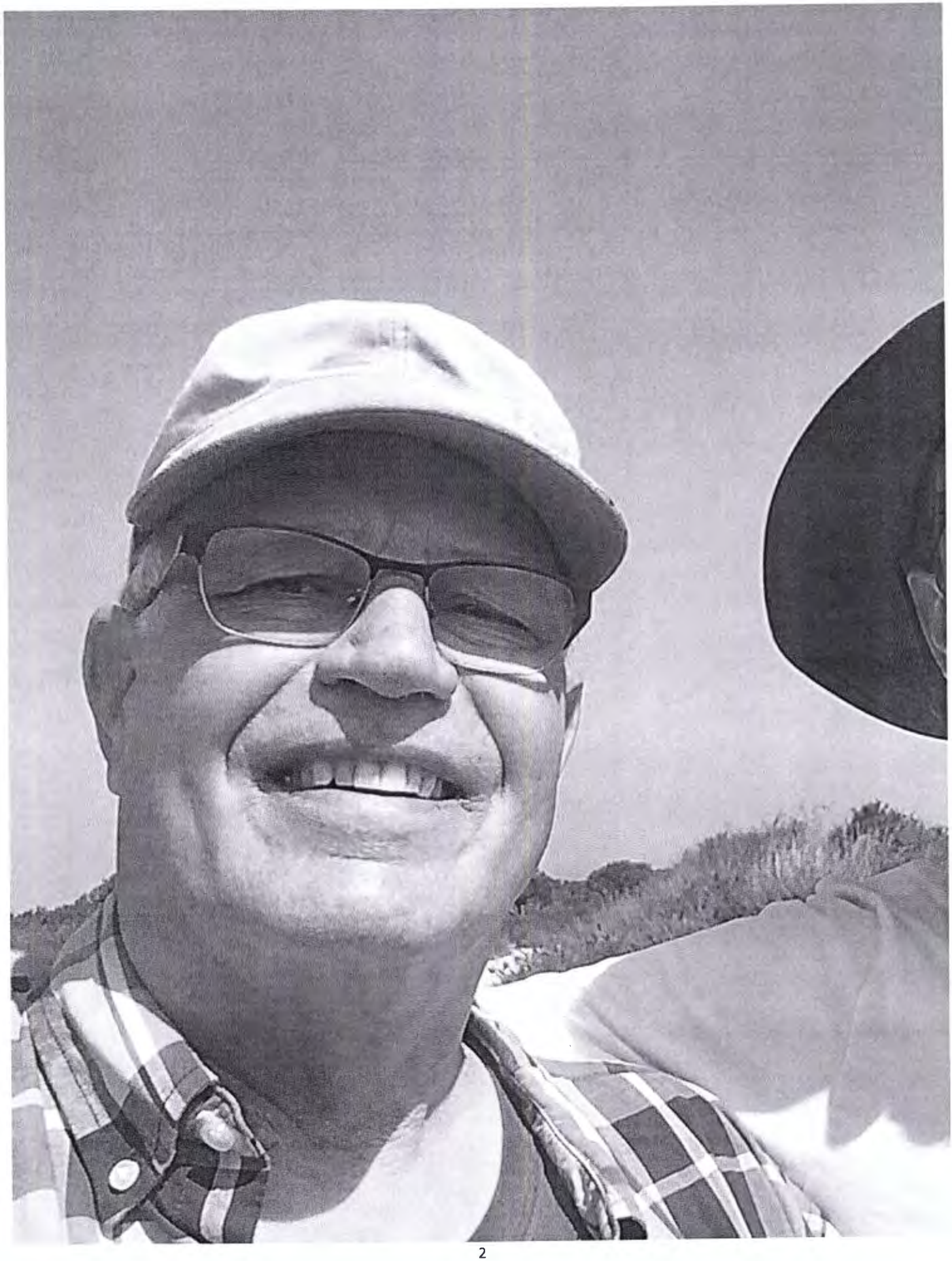
Thank you ,

Gwyn De Amaral
Carmel Highlands Ca

Luster, Tom@Coastal

From: Alex Stewart <akstew@sbcglobal.net>
Sent: Tuesday, September 08, 2020 7:51 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:



My name is Alex Stewart and I live in Marina with my son, Simon. I am retired and my 25 year-old son graduated last year from CSUMB and received his Substitute Teaching Credential last Summer. My family has lived in Marina since 1968 and Simon went to all Marina schools. I graduated from Seaside High in 1970 and he graduated from Marina High in 2013.

Marina already shoulders the burden of many County resources (landfill, recycled water...etc) and the LCP shows that we need healthy dunes to combat rising sea levels due to climate change. Constructing the CalAm slant wells in sensitive and protective dunes is bad for Marina.

Please deny the CalAm Slant Well Project!

Thank you-Alex Stewart

Luster, Tom@Coastal

From: Berj Amir <berj_amir@yahoo.com>
Sent: Tuesday, September 08, 2020 7:40 PM
To: CalAmMonterey@coastal
Subject: Deny California American Water's Desal Project

Dear Costal Commission Members,

I am writing to urge you to deny California American's application for a water desalination plant in the Monterey area. I am a resident of Seaside, California. I making this request for two reasons.

First there is a much better option available that is not only environmentally sound, but much less costly. Expanding the Pure Water Monterey Project simply makes sense and is a far more efficient solution to the water needs for our area.

Second, California American Water Company has a terrible record of management. They are inefficient, and costly. They seem to have no motivation to run things in an efficient manner, as they simply keep applying for any and all possible way to increase costs to the consumer in this area. The information that they send out is misleading and often outright inaccurate, and they spend no expense to doing so, as your commission has no doubt been lobbied by them very heavily to approve the desalination proposal.

To hand an already incredibly costly project over to such a company will do no good for our community, we are already paying some of the highest cost for water in the country thanks in great part to California American's management. It simply makes no sense at all when there is a perfectly good, environmentally sound, less costly alternative available.

I cannot afford a team of attorney's and administrators to lobby for my best interests as California American Water has, I am relaying on you. Please deny this request. It is not the best solution, and it would be managed by one of the worst companies I have ever had to be a customer of. I need water, and I cannot drill my own well, so I have to business with them.

Respectfully,

Berj Amir
Resident, Seaside California 93955

Luster, Tom@Coastal

From: Lynn Johnson <lynnjohnson100@gmail.com>
Sent: Tuesday, September 08, 2020 7:39 PM
To: CalAmMonterey@coastal
Subject: Desalination Plant

I have lived on the Monterey Peninsula for over 35 years and I have been following the water situation. I am convinced that we do not need a desalination plant. The rates here are already the highest in the nation and will go up even more with desalination.
Pure Water Monterey can provide us the needed water at less cost and less destruction to the environment.

Please vote against the desalination plant.
Lynn Johnson

1836 Highland St

Seaside, Ca.

Luster, Tom@Coastal

From: RacerX <seacleandiver@gmail.com>
Sent: Tuesday, September 08, 2020 7:36 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034/Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth & Staff:
Regarding the; CalAm Desalination Project Permit,
PLEASE STOP THIS ENVIROMENTALLY HARMFUL PROJECT!
Regards,
Randolph Fry
Marina, CA
Sent from Mail for Windows 10

Luster, Tom@Coastal

From: Howley, Annie <ahowley@middlebury.edu>
Sent: Tuesday, September 08, 2020 7:34 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Annie Howley and I am a 27 year old resident of Monterey, California. I grew up in the small town of Sebastopol, California, attended UC Davis with a major in Environmental Science and Management (with a minor in Managerial Economics), and then lived in San Francisco before moving to beautiful Monterey County. In addition to working for a consulting firm that supports electric utilities with their efforts to modernize the electric grid, I am a Graduate Student at the Middlebury Institute of International Studies at Monterey. I am studying International Environmental Management.

Please deny this harmful project. Thank you!

Sincerely,
Annie Howley

Annie Howley
MA International Environmental Policy Candidate
Middlebury Institute of International Studies at Monterey
ahowley@middlebury.edu | c: 707.921.9143
She/Her/Hers

Luster, Tom@Coastal

From: ghbabbitt02@comcast.net
Sent: Tuesday, September 08, 2020 7:29 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am!

Coaster Commissioners!

I urge you to deny Cal Am's desal permit. This project is not in the public interest and there is an environmentally superior alternative in the expansion of Pure Water Monterey.

I've read much on the topic – representing both sides – and cannot support Cal Am's proposal over that of Pure Water Monterey.

Thank you!

Ginny

Ginny Babbitt
990 McClellan Ave
Monterey, CA 93940

Luster, Tom@Coastal

From: Kay Cline <kecline@sbcglobal.net>
Sent: Tuesday, September 08, 2020 7:26 PM
To: CalAmMonterey@coastal
Subject: Please deny Cal Am's Desal Plant

Dear California Coastal Commissioners,

I am a 30 year Seaside resident who ran for Mayor of our city in 2016. I am very concerned about the number of low and moderate income local residents who will be greatly impacted financially by the costs of an unnecessary desal plant.

Due to creativity and hard work, our region has Pure Water Monterey (PWM) ready to provide enough water to suffice for 30 years at a much lower cost than desal. This is the solution favored by many residents, Monterey Peninsula Water Management District and Marina Coast Water District.

Please, stand for social justice and practicality. Follow your staff's recommendation and deny Cal Am's desal.

Respectfully,

Kay Cline

Luster, Tom@Coastal

From: Jason Scorse, Middlebury Institute <profscorse@gmail.com>
Sent: Tuesday, September 08, 2020 7:00 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Jason Scorse, a resident of Aptos. I'm a professor at the Middlebury Institute of International Studies in Monterey where I direct the Center for the Blue Economy. I've been following this issue closely and I ask that you please deny this harmful project. It's unjust, environmentally destructive, and unnecessary. There are much better solutions to provide clean affordable water to the Marina (and surrounding) community, without threatening endangered species.

Thank you,
Jason

--

"One way or another, this darkness got to give." **Jerry Garcia**

"Those living a lie will act offended when you confront them with the truth." **Anonymous**

"It is a caricature of love when you want to give in charity what you owe for justice." **Oscar Romero**

Jason Scorse, Ph.D.
Associate Professor
Chair, International Environmental Policy Program
Director, Center for the Blue Economy
Graduate School of International Policy and Management
Middlebury Institute of International Studies at Monterey
Office: K23, Craig Building

Zoom Meeting Room: Password7sQnmz
Faculty Webpage
LinkedIn
Book: What Environmentalists Need to Know About Economics

Luster, Tom@Coastal

From: Gary & Diane McCluskey <gdmccluskey@gmail.com>
Sent: Tuesday, September 08, 2020 6:57 PM
To: CalAmMonterey@coastal
Subject: Cal Am desal plant

As a resident in Cal Am's jurisdiction, I am asking you to please deny Cal-AM's proposed desal plant. My request is based upon the finding of the Coastal Commission's Staff Report along with the following facts.

1. Cal Am water is already some of the most expensive water in the country, and this project would significantly raise the water cost of not just the low income. It also purposes hardships for those of but those of us that are considered middle income (the ones who already bear most of the burden for taxes and subsidized programs) and that are trying to be responsible citizens and budget and save for emergency funds and retirement. This project will raise water cost significantly over what the alternative program offers. This is already difficult considering my billed has already doubled since we started paying the fee for saving water during the drought.
This increase would also be inaction to another increase Cal Am is requesting to allow them to purchase and subsidize another failing water company.

2.The know negative impacts to the environment, along with the likely potential for other significant negative impacts to the environment.

3. The irresponsibility Cal Am has already demonstrated with it's lack of action, or even planning for solutions to address the over-drafting of water from the Carmel River, until just before the deadlines. Cal Am's lack of planning has resulted in poorly conceived and though out solutions, inadequate planning and studies, inaccurate budget proposals which then spurred multiple lawsuits only adding to the cost of its project. Increased costs that Cal Am wants to pass on to it consumers.

4. There is a lot of opposition to this project in the community, in fact it has spurred efforts in the community for buying CalAm out and making the water a public utility. Why then approve and start a project that is so costly and has so much opposition, when it has a high potential to end up a waste of tax payer money as Cal Am gets caught up in lawsuits and can't afford to finish the project without raising costs even more- especially when there is an alternative that has already demonstrated success. This project also has the likelihood of only being a short term solution (20-25 year) given the projected life of the wells and lack of feasible new sites. -So what happens then? Another costly project?
What will also happen if Cal Am is bought out- will it get scrapped and all that money wasted given there is so much opposition to the project.

5 Cal Am solution appears to be an extremely expensive temporary solution and not a tru solution to the problem given the expected lifespan of its wells and it apparent ability to demonstrate reasonably attainable alternative well sites when the proposed well are no longer accessible/useable.

Diane McCluskey

Luster, Tom@Coastal

From: Kristen Atkins <kgwatkins60@gmail.com>
Sent: Tuesday, September 08, 2020 6:54 PM
To: CalAmMonterey@coastal
Subject: Please deny Cal Am's coastal development permit

To whom it May Concern,
Please deny a permit for Cal Am's proposed Desal project. I have been following this for months and I believe this is not a good plan. Please review the data and I believe this will not harm our citizens. The Pure Water Expansion plan is the healthier option and I would like to advocate for this option over the Desal plant. I have lived in Carmel Valley for 12 years and I respect the work everyone has done on this matter.
Thank you,
Kristen Atkins, Carmel Valley

Sent from my iPad

Luster, Tom@Coastal

From: Harold JORDAN <jordan0814@sbcglobal.net>
Sent: Tuesday, September 08, 2020 6:48 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

Dear California Coastal Commissioners:

Please Deny Cal Am's desal Permit on September 17.
Cal Am is a G-R-E-E-D-Y stock holding corporation.
They've been RIPPING OFF Monterey County customers since day one decades ago.
Cal Am needs to be dismantled & eliminated A.S.A.P.

H. Roy Jordan

Luster, Tom@Coastal

From: Keith Day <22116@gopalma.org>
Sent: Tuesday, September 08, 2020 6:29 PM
To: CalAmMonterey@coastal; Joey Silva

Dear CA Costal Commissioners, Executive Director John Ainsworth and staff:

My name is Keith Day Jr and I am a residence of Chualar. I am a Junior in Palma Highschool. I am currently taking a AP Environmental Sience class. I believe that the CalAm water project is an injury act environmentally to the Marina community. The project threatens to harm groundwater in Marina, and will underestimate the impacts of the project. The CalAm project is focusing more on the benefits of its customers rather than the environment and its natural resources. I hope that the community makes the right decision on saving the environment.

Deny the CalAm Slant Well project!

Signed,
Keith Day Jr.

Luster, Tom@Coastal

From: frederica jones <outlook_BD9B446720695E4E@outlook.com>
Sent: Tuesday, September 08, 2020 6:25 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's permit

Dear Commissioners,

I have been a Del Rey Oaks resident for over 13 years and unfortunately have been a Cal-Am ratepayer. My rates have sky rocketed, and I have been using less water..... as requested...

It's clear that with Pure Water Monterey, Cal-Am now has the water it needs to meet the cease and desist order, restoring the water needed for the protection of the Carmel River Steelhead. It is my opinion that with the recycled water project, we are moving in the right direction by reusing our wastewater, which there is plenty of, and protecting our natural resources.

There is still an issue with needing water for sustainable growth and that's where the rub comes in. Cal-Am and the local politicians and business interests who see water as their limiting factor for unrestrained growth, are pushing this project. In doing so, they have adversely affected votes for the expansion of Pure Water Monterey, just so they can continue to have a water source that satisfies their needs, even though it's environmentally damaging and far more expensive for the ratepayers. They have been moved to lies and unethical behaviors such as withholding environmental documents that the residents paid for so that it looked like the expansion was not feasible.

PLEASE, DO NOT be swayed by their politics. PLEASE DENY Cal-Am's permit for their desal project. It is not necessary and carries too many ramifications. The facts are out and clearly we have a project that is feasible, not environmentally damaging, provides water at a cheaper price, has no legal barriers ahead, and can be accomplished within a reasonable time frame. The Pure Water Monterey expansion project is the way to go!!!!

Thank you for your time,
Frederica Jones

Sent from Mail for Windows 10

Luster, Tom@Coastal

From: Kim Shirley <kimshirley1@gmail.com>
Sent: Tuesday, September 08, 2020 6:05 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

Dear Commissioners,

I am a Del Rey Oaks resident and a Cal-Am ratepayer. Knowing that we had a cease and desist order for the Carmel River and with our water rates moving sky-high, I decided to pay attention to our local water issues. What I found was entirely political.

It's clear that with Pure Water Monterey, Cal-Am now has the water it needs to meet the cease and desist order, restoring the water needed for the protection of the Carmel River Steelhead. With the recycled water project, we are moving in the right direction by reusing our wastewater, which there is plenty of, and protecting our natural resources.

There is still an issue with needing water for sustainable growth and that's where the rub comes in. Cal-Am and the local politicians and business interests who see water as their limiting factor for unrestrained growth, are pushing this project. In doing so, they have adversely affected votes for the expansion of Pure Water Monterey, just so they can continue to have a water source that satisfies their needs, even though it's environmentally damaging and far more expensive for the ratepayers. They have been moved to lies and unethical behaviors such as withholding environmental documents that the residents paid for so that it looked like the expansion was not feasible.

Do not be swayed by their politics. Please DENY Cal-Am's permit for their desal project. It is not necessary and carries too many ramifications. The facts are out and clearly we have a project that is feasible, not environmentally damaging, provides water at a cheaper price, has no legal barriers ahead, and can be accomplished within a reasonable time frame. The Pure Water Monterey expansion project is the way to go.

Thank you for your time,
Kim Shirley
Del Rey Oaks resident

Luster, Tom@Coastal

From: Epiphany Antoinette <epiphanyt95@gmail.com>
Sent: Tuesday, September 08, 2020 5:46 PM
To: CalAmMonterey@coastal
Subject: Appeal

Dear California Coastal Commissioners and Coastal Commission Staff:

Hello Everyone:

My name is Epiphany Thompson, I'm 19 years old , I attended Marina high and now go to Monterey Peninsula College. I work unpredictable hours driving DoorDash while I"m going to school, so I can't attend meetings. I appreciate the opportunity to speak up here.

By proceeding to do the following building these pipes under the dunes just to re-sell the water back to the peninsula is first off, not a positive change to society ,and secondly it only supports the drawback of-this country which is being so money hungry that you constantly put money over human well being.

Not to mention all the extra industrialization and the stress it puts on the environment. If you permit these pipes, you show that you care about money over the environment's health and well being of others.

For example a college student like myself will spend 40+ years of their lives working a career they were rushed into or that they don't enjoy all because this society taught us to care about money more than ourselves and our lives essentially. We sell our happiness and mental health slaving at work day after day just to stay afloat already - so why add this financial burden to the already hard working citizens of the community and decrease the environment?.

The working class already works hard to just live here , not to mention taking into account those with kids and single parents, Plus young adults on their own that simultaneously do work and school while paying rent trying to stay afloat on top of all the other things life throws at you.

So my only question is - if this isn't going to be a positive change or beneficial for the vast majority of the community why do it? And how do you feel morally about the decisions you're making knowing it can affect and pollute our water?

We should give the Pure Water Recycling Project a chance before making a negative impact on Marinas water system . **Please deny the de-sal project per**mit.

Thank you.

Epiphany Thompson/ Marina

Luster, Tom@Coastal

From: John Norman <normanj713@hotmail.com>
Sent: Tuesday, September 08, 2020 5:40 PM
To: CalAmMonterey@coastal
Subject: Proposed Desalination Plant

Please do not approve Cal Am's proposal for a desalination plant. We are already paying too much for our water, we cannot afford to have our rates double. Please don't let Cal Am do this to us, many of us are struggling and Cal Am has no empathy, only a craving for ever growing profits. Please consider the impact on the quality of life of many thousands of Seaside residents before you render your decision.

Thank you,

John Norman

Luster, Tom@Coastal

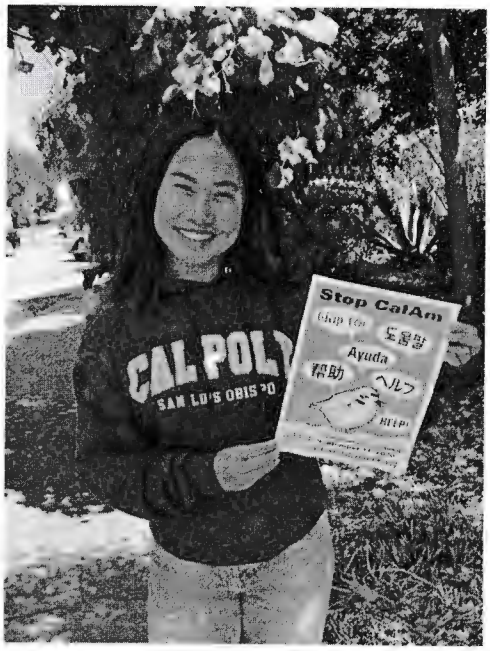
From:	Susanna Hoffman <suhoffma@calpoly.edu>
Sent:	Tuesday, September 08, 2020 5:06 PM
To:	CalAmMonterey@coastal
Cc:	D Cleary
Subject:	Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination

Dear Coastal Commission Staff:

My name is Susanna Hoffman. I graduated from Marina High School, and now I'm attending college at Cal Poly San Luis Obispo.

My parents and I recycle every drop of water we can in our household. I hope we haven't been doing all that careful conservation just end up with Cal Am reselling our aquifer to hotels on the Peninsula and to growers in Castroville!

Please deny this desalination project permit!



Thank you,

Susanna Honggui Hoffman
Sunrise Circle, Marina CA

Luster, Tom@Coastal

From: Jackie Perry <perrysretired@yahoo.com>
Sent: Tuesday, September 08, 2020 5:05 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A*3*MRA*19*0034: Deny Cal Am Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and Staff

My name is Jacqueline Perry and I have been a resident of Marina for four years. I am a senior citizen and am deeply concerned for our community and the CalAm Slant Well Project. I love my community and am so concerned that the Slant Well will damage our precious environment. Please do not let Cal Am destroy our community!

Sincerely,

Jacqueline Perry
Marina, CA

Luster, Tom@Coastal

From: Rafael Granados <mr.rafael.granados@gmail.com>
Sent: Tuesday, September 08, 2020 5:00 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Rafael Granados; I am a resident of Marina (432 Combs Ct). My family and I just moved to this wonderful area. We are concern about the CalAm project and would like to as that you please deny this harmful project. Thank you

Rafael Granados

Luster, Tom@Coastal

From: Tom Rivelli <tom@rivelli.com>
Sent: Tuesday, September 08, 2020 4:36 PM
To: CalAmMonterey@coastal
Subject: Vote Against Approval of CalAm Desal Project

It is not necessary and much too expensive compared to the Pure Water Monterey alternative that you are well aware of.

Regards,

Tom Rivelli Associates: www.rivelli.com
ProTips Media: www.protipsmedia.com
Phone: 831-394-5119
Email: tom@rivelli.com
LinkedIn: https://www.linkedin.com/pub/tom-rivelli/17/538/30b

Luster, Tom@Coastal

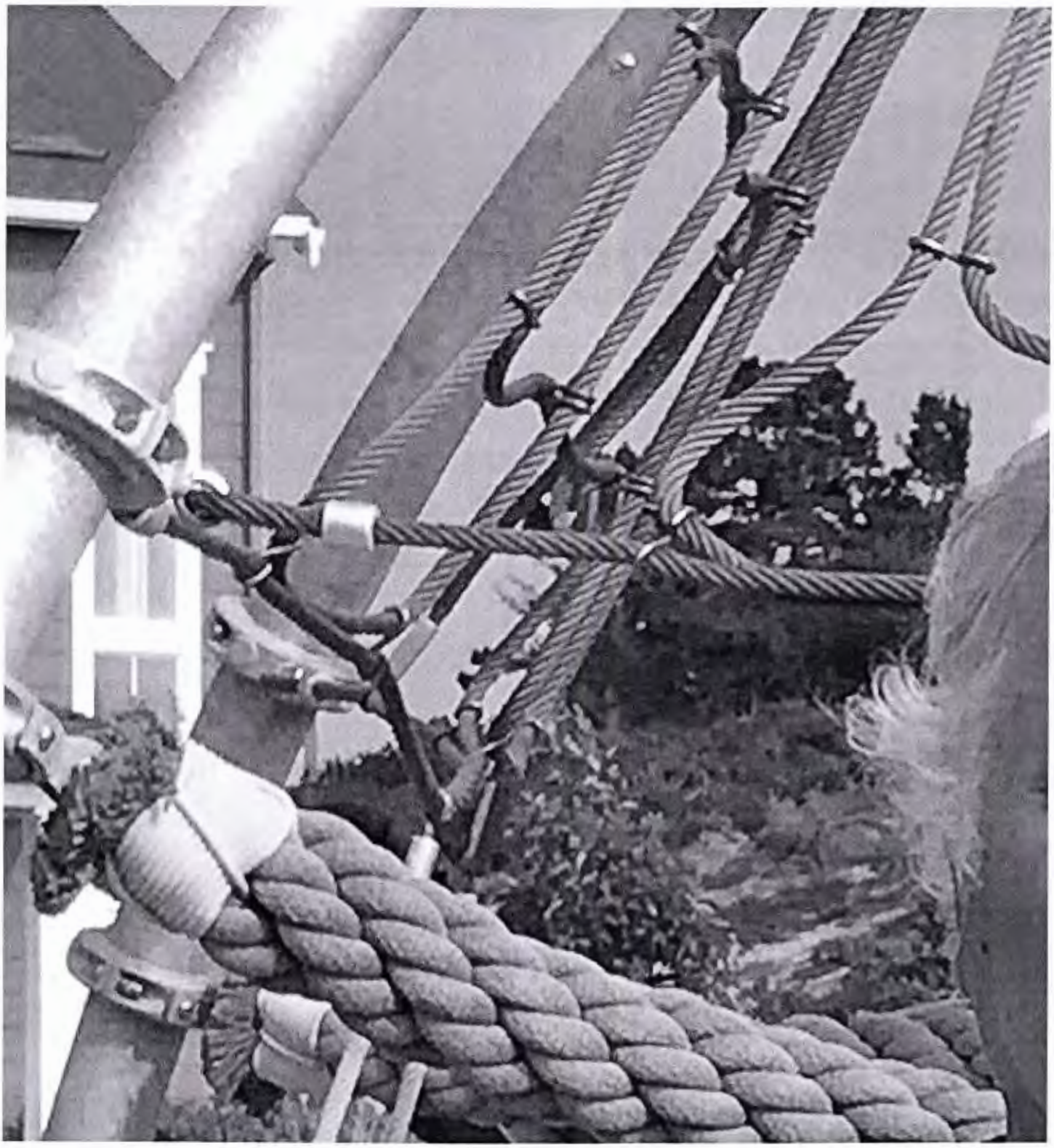
From: Jeff Dee <jffdee@att.net>
Sent: Tuesday, September 08, 2020 2:55 PM
To: CalAmMonterey@coastal
Subject: Water

We don't want nor need cal-am and there deceptive business practices and want a more economical sound resource!! NO ON DRILLING!!!

Sent from my iPhone

Luster, Tom@Coastal

From: Cheryl DeGier <j.degier@att.net>
Sent: Tuesday, September 08, 2020 3:51 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit



Dear CA Coastal Commissioners, Executive Director John Ainsworth, and Staff:

We are writing to ask you to deny the CalAm Slant Well project. We moved to Marina so we could be near this beautiful coastline. Please heed your duty to preserve it.

The CalAM desalination plant would damage our water and our dunes, with an industrial site on our pristine coast. And the result? CalAm would take Marina's water, without water rights, and provide it to other cities on the peninsula, not Marina.

Marina is a diverse low income community, where a majority of the population is non-white. We oppose this discriminatory land use policy. The wealthier communities should not take our town's water!

Pure Water expansion is the least environmentally damaging choice. Please save the snowy plover. We love walking on Marina's beach line and seeing this amazing bird and all the other wildlife and beauty. Save our town, save our water, and save our coastline.

Please deny the CalAm Slant Well project!

Thank you,

Cheryl & Joe de Gier

Luster, Tom@Coastal

From: Susan Morse <smorse21st@gmail.com>
Sent: Tuesday, September 08, 2020 3:24 PM
To: CalAmMonterey@coastal
Subject: Deny CalAm's Desal proposal

Dear Commissioners,
Please resist CAlAm's backroom pressure, deny the desal proposal, as is recommended in the report of your staff.
Desal is expensive, involves questionable environmental processes, and is not necessary in Monterey county. We are an earnest community who can save and reuse water, and don't need a lot of growth, especially in light of the covid and post covid era we need to shift into.
We have voted to get CAl Am out of the picture, please honor our votes and our wishes.
Susan Morse
Carmel, CA 93923

--

Susan C. Morse

smorse21st@gmail.com
831 915-8691

Luster, Tom@Coastal

From: Sylvia Shih <58eugenia58@gmail.com>
Sent: Tuesday, September 08, 2020 2:49 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

Dear Commissioners,
I am writing to you again to request a Deny of Cal Am's Desal Project.
Aside from all the reasons presented by your staff report, I found CAL AM tricking the rate payers into supporting its Desal Project. Herald has published my letter to the editor.
It is inline here to show one more reason to deny Cal Am's desal project.

Monterey Herald • September 8, 2020

Suspicious of postcard ask

A black and white large postcard came to me and my neighbors in Seaside asking us to write to the California Coastal Commission (CCC) to support the Monterey Peninsula Water Supply Project. The postcard made me feel suspicious. Upon checking, I realized it is asking me to write to CCC to support the desalination project of California American Water.

The cost of water of the proposed desalination project is more than three times the cost of water produced by recycling. The postcard is attempting to mislead its readers to write to CCC to support desalination.

I wonder how many unknowing readers have been misled. I also wonder why Cal Am would not come out openly to tout its desalination project which it has been pushing hard everywhere.

Sylvia Shih, Seaside

Luster, Tom@Coastal

From: Leland R Smith <gloriousvista@yahoo.com>
Sent: Tuesday, September 08, 2020 2:41 PM
To: CalAmMonterey@coastal
Subject: deny the desal plant

Please find it in your heart, and our pocket books, to deny the desal plant that is too expensive, does not help the community with property taxes if it affects sales of homes and the Pure Water saving method is working.

Leland Smith

I have lived in Carmel Valley for 36 years. When I moved here I think I was paying $20 a month for water. I was not wasting water even during the 80's.

Luster, Tom@Coastal

From: kristin@worldcitizen.cc
Sent: Tuesday, September 08, 2020 2:39 PM
To: CalAmMonterey@coastal
Cc: Sylvia Shih
Subject: Re: Cal Am's Desal Project

Done!
Love,
Kristin

On Sep 8, 2020, at 2:37 PM, kristin@worldcitizen.cc wrote:

Dear Coastal Commission,

Please!
We don't need Cal Am's oversized, over priced desal project to solve our future water supply needs.
What do we owe Cal Am - who have given us only the highest water rates in the country??

First of all, Cal Am's Desal project is certainly not in the public interest.

Secondly, there is an alternative!
One that is not only feasible, environmentally preferable and more than adequate for the Penninsula's water needs. Also, it is much more affordable:

It's Pure Water Monterey Expansion plan:

Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021.

The environmental issues facing the Carmel River are resolved without Cal Am's desal.

This is MUCH more in our interest and to our benefit than Cal Am could ever be.

Respectfully,
Kristin Ramsden

*:...:**:...:*:...:**:...:*
Kristin Ramsden
kmramsden@gmail.com

<PastedGraphic-12.tiff>

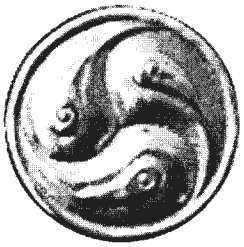
Constant change
...for the better....
*:...:**:...:*:...:**:...:*

32 Miramonte Rd.
Carmel Valley, Ca.,
93924 USA

mobile: 207-208-7888
landline: 831-659-7888
*:...:**:...:*:...:**:...:*

*:...:**:...:*:...:**:...:*
Kristin Ramsden
kristin@worldcitizen.cc

"Really nothing is worse....
than not to try to gain an understanding
of every kind of human feeling
and human sensation and human life."
~ Rudolf Steiner



Constant change
...for the better....
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mobile: 207-208-7888
landline: 831-659-7888
*:...:**:...:*:...:**:...:*

Luster, Tom@Coastal

From: kristin@worldcitizen.cc
Sent: Tuesday, September 08, 2020 2:38 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

Dear Coastal Commission,

Please!
We don't need Cal Am's oversized, over priced desal project to solve our future water supply needs.
What do we owe Cal Am - who have given us only the highest water rates in the country??

First of all, Cal Am's Desal project is certainly not in the public interest.

Secondly, there is an alternative!
One that is not only feasible, environmentally preferable and more than adequate for the Penninsula's water needs. Also, it is much more affordable:

It's Pure Water Monterey Expansion plan:

Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021.

The environmental issues facing the Carmel River are resolved without Cal Am's desal.

This is MUCH more in our interest and to our benefit than Cal Am could ever be.

Respectfully,
Kristin Ramsden

*:.....:**:.....:*:.....:**:.....:*
Kristin Ramsden
kmramsden@gmail.com

Constant change
...for the better....
*:.:.:**:.:.:*:.:.:**:.:.:*

32 Miramonte Rd.
Carmel Valley, Ca.,
93924 USA

mobile: 207-208-7888
landline: 831-659-7888
*:.:.:**:.:.:*:.:.:**:.:.:*

Luster, Tom@Coastal

From: Marlene Johnson <mjohnson9158@sbcglobal.net>
Sent: Tuesday, September 08, 2020 2:32 PM
To: CalAmMonterey@coastal
Subject: CalAm's Desal Proposal

Dear CalAm Constituents,

I received a flyer in the mail announcing the intent of CalAm to undermine the integrity of Marina's groundwater basin. If this information is accurate, I wish to add my voice to the opposition of this proposal.
Born in Monterey, Marina is home to me and my family. You can understand our concern for the future of our children, our city, and our community.

Respectfully,
Marlene Johnson
mjohnson9158@sbcglobal.net

Luster, Tom@Coastal

From: Mark Poehner <markpoehner@icloud.com>
Sent: Tuesday, September 08, 2020 2:30 PM
To: CalAmMonterey@coastal
Subject: No Desalination Plant

Living on the Monterey Peninsula for 26 years, I am aware of the water supply needing care and conservation. There is no room for waste. Yet a combination of factors leads to mismanagement and waste: it is a paradise of arid beauty, cool weather and welcoming social groups, although some are elitist and exclusive. The combination has severe maladaptive behaviors. The natural beauty entices tourists to a lucrative hospitality indeed which neither educates nor rations water. The Departament of Defense had two facilities that bring personnel from areas that don't have droughts and don't educate their personnel on water usage. And there's a huge surplus of golf courses.

On top of that, residents have been saddled by an unscrupulous private company that wants to profit by addressing the so-called "shortage" by building a facility that will contaminate Monterey Bay, the regional environment and agricultural lands. This company's marketing efforts are deceitful, and add to the expenses that they pass on to already abused customers.

Please vote against the desal plant.

Thank you,
Mark Poehner

Luster, Tom@Coastal

From: Marikay LeValley <marikaylevalley@gmail.com>
Sent: Tuesday, September 08, 2020 2:19 PM
To: CalAmMonterey@coastal
Subject: Desal

Dear Coastal Commissioners,
Thanks for all you do to protect our unique and valuable coast. I would like to encourage you to deny a coastal permit for Cal Am's desal plant.
The Pure Water Monterey Expansion program is a more affordable and environmentally smart way to go. I live on the Carmel River and have seen the depletion of steelhead over the decades. We can do more to preserve our resources by using wisely what's already here and not creating a new set of negative consequences incurred by desal.
Thanks again,
Marikay LeValley

Luster, Tom@Coastal

From: james rogers <jrogers@garlic.com>
Sent: Tuesday, September 08, 2020 2:18 PM
To: CalAmMonterey@coastal
Cc: Andy; Amy Rogers
Subject: Deny Cal Am's Desal Project

Dear Sirs:

We own a home in Pacific Grove that my son's family lives in. We feel very strongly that all water systems should be publicly owned. Please deny Cal Am's application for a desalinization plant. We understand this is a very complex decision, but beg you to vote in favor of the water users, not a profit-making corporation.

Jim and Connie Rogers
7690 Santa Theresa Drive
Gilroy, CA 95020
408-842-8494

Luster, Tom@Coastal

From: Nina Harrison <niharrison@aol.com>
Sent: Tuesday, September 08, 2020 2:16 PM
To: CalAmMonterey@coastal
Subject: Desal Plant

We do not need a desal plant. Please do not allow it. CalAm is about making money.
NinaJarrison

Sent from my iPhone

Luster, Tom@Coastal

From: lhschwabe@aol.com
Sent: Tuesday, September 08, 2020 11:12 AM
To: CalAmMonterey@coastal
Subject: Desal

I was an engineering member of a 12,000,000/day desal plant. What a disaster besides consuming 100,000 horsepower (aren't we supposed to be a green state???), the maintenance costs are astronomical, the membranes have a short life and the equipment is huge the pumps we used were 10' tall, prone to fail and have enormous costs to repair.

There are much more environmentally sounds sound ways to supply our water needs.

The only reason Cal Am wants a desal plant **is GREED,.** Per law a contractor is allowed to charge 10% overhead and **10% profit** so the more expensive the project the more they make.

What a ripoff to the consumers who would see are costs for water sky rocket.

Lester Schwabe

Luster, Tom@Coastal

From: Sandra Gray <sandrag394@gmail.com>
Sent: Tuesday, September 08, 2020 2:06 PM
To: CalAmMonterey@coastal
Subject: Deny CAL-AM desalination project

Please deny the CAL-AM desalination project. It is not the best project for our areas needs. Expand the Pure Monterey Now Project. It is ready to go and will cost less and save water. --

Sandra Gray

Redbubble to view and buy art and photos

Luster, Tom@Coastal

From: HELEN BILL BIRDSONG <helenbirdsong@comcast.net>
Sent: Tuesday, September 08, 2020 1:58 PM
To: CalAmMonterey@coastal
Subject: deny Cal Am's desal permit

I am voting that Cal Am's desal permit be denied.

Helen Birdsong
231 Pheasant Ridge Road
Del Rey Oaks 93940
Home owner

Luster, Tom@Coastal

From: Alan Vavrin <avavrin@sbcglobal.net>
Sent: Tuesday, September 08, 2020 1:54 PM
To: CalAmMonterey@coastal
Subject: Deny CalAm

I am against CalAm project, the alternative addresses the needs of the public. CalAm is looking at future profit returns and ignoring the costs to communities who would have carry the burden of affordable water.

This is not in the interest of the people!

Sent from my iPhone

Luster, Tom@Coastal

From: Judy Refuerzo <carmelspinone@me.com>
Sent: Tuesday, September 08, 2020 12:53 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's desal permit

Dear Coastal Commissioners,

Please deny Cal Am's desal permit. Cal Am desal project is not in the best interest of our peninsulas environment and not the answer to our affordable housing.

Pure Water Monterey is a superior alternative.

Please do what is right for our environment and our future generations. - Deny the desal permit.

Judy Refuerzo
Carmel by the Sea

Luster, Tom@Coastal

From: Pat Creese <pat.creese@hotmail.com>
Sent: Tuesday, September 08, 2020 12:46 PM
To: CalAmMonterey@coastal
Subject: de sal

Please vote to DENY the desalinazation plant.

Big money from Cal Am should not dictate your vote.
Please do the right thing for all of us.

Thank you

Pat Creese
Martin Road
Carmel,
Ca.

Sent from Mail for Windows 10

Luster, Tom@Coastal

From: Carole Ehrhardt <ehrhardtc@gmail.com>
Sent: Tuesday, September 08, 2020 12:44 PM
To: CalAmMonterey@coastal
Subject: Lies by Cal AM

We are really tired of hearing all the lies coming from Cal Am. When we citizens first tried to purchase the company, we were bombarded with very clever, but misleading, statements on this "important wonderful company". Enough people believed them. For the next election, those same lies were not believed as rates again were raised so that Cal Am customers pay the highest rates in the nation. The company spends money each day with radio ads telling us how wonderful they are. Unfortunately, repairs to an aging infrastructure are ignored. We did learn that 19 million dollars were paid to their stockholders and we have no clue how much goes to the executives.

Our second vote authorized us to purchase the company. Of course this "cash cow" is gold to Cal Am and they will fight with their attorneys to keep this lucrative company.

We now have recycled water to last for decades. We do not need or want the expensive desal treatment plant with the expense added to our already high bills. Affordable water should be a right. Not all local citizens will be able to afford water at the rates Cal Am will charge.

Please deny Cal Am's request for the desal plant. Thank you.

Sincerely,

Carole Ehrhardt

--

Carole Ehrhardt
P.O. Box 243
Pebble Beach, CA 93953

Luster, Tom@Coastal

From: John Bird <jbnapa1@gmail.com>
Sent: Tuesday, September 08, 2020 12:31 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

Dear Commissioners,

I respectfully ask you to deny Cal Am's desal permit. This project is not in the public interest and there is an environmentally superior alternative in the expansion of Pure Water Monterey. Please consider this.

The Desal plant is not in the public's best interest.

Regards,
John Bird
70 Forest Ridge Rd
Monterey, CA 93940
Homeowner
831 920-6430

Luster, Tom@Coastal

From: MICHAEL MCMILLAN <mmcmillan@cypresshealthcare.com>
Sent: Tuesday, September 08, 2020 12:30 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project
Attachments: image001.png; image002.jpg

Dear Commissioners,

I have been a resident of the Monterey Peninsula area for 30 years, as well as a business owner for the past 26 years, employing over 550 people in more than 20 locations in Monterey County.

I strongly oppose Cal-Am desal project for financial and environmental reasons. Pure Water Monterey is a much better alternative.

It's absurd that Cal-Am over the years has raised rates, driving down demand/usage as intended, and then files for rate increases to cover the lost revenue. What a great business model – sell less of your product that customers can get nowhere else, resulting in reduced operating expenses, and then increase rates to cover the revenue shortfall. Too bad my business can use the same model.

I am in a 2-person household with all the latest water-saving fixtures and appliances, and I don't have a blade of grass on my quarter acre lot with drought resistant plants only watered by drip irrigation. Yet my monthly water bill is >$300 in the Winter and >$650 in the Summer.

PLEASE DENY CAL-AM's DESAL PROJECT!

Michael McMillan
Cypress Healthcare Partners
Central Coast MSO
Doctors on Duty
(O) 831.649.1000
(D) 831.242.8600
(M) 831.238.5210
mmcmillan@cypresshealthcare.com<mailto:mmcmillan@cypresshealthcare.com>

[signature_172942828][signature_639734718]

confidential and contain information protected by state and federal medical privacy statutes. They are intended only for the use of the addressee. Any disclosure, copying, or distribution of this information is strictly prohibited. If you received this transmission in error, please accept our apologies, delete the message and notify the sender. Thank you.

Luster, Tom@Coastal

From: Dianne Driessen <diannedriessen@yahoo.com>
Sent: Tuesday, September 08, 2020 12:29 PM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project

Cal Am's Desal Project is inconsistent with relevant Coastal Act and LCP policies and there is a a feasible, less damaging alternative from Pure Water Expansion that will adequately provide water and protect the public welfare. Please vote in accordance with the staff report to deny Cal Am's Desal Project. They have taken the time and done the work to evaluate the project. This was their job to do and they recommend that the project be denied.

Staff believes, after weighing the evidence in the record at this time, that the Pure Water Expansion is a feasible alternative to Cal-Am's Project, will allow Cal-Am to cease its illegal water withdrawals from the Carmel River and meet the region's water needs, and is the preferable, least environmentally damaging alternative. The Pure Water Expansion would also result in fewer environmental and economic burdens to the communities of concern within Cal-Am's service area, would avoid environmental burdens to the City of Marina, and appears to have fewer significant hurdles to clear before it could be implemented. It is important to note that the Commission does not have the authority to actually approve, or require approval of, the Pure Water Expansion project. Rather, the Commission's role is to determine whether Cal-Am's Project is Application 9-19-0918 / Appeal A-3-MRA-19-0034 (California American Water Co.) 4 consistent with relevant Coastal Act and LCP policies, whether there is a feasible alternative to the Project, and whether denial of the Project would harm the public welfare. Staff recommends finding that the Project is inconsistent with relevant Coastal Act and LCP policies and that the Commission may not approve the Project despite those inconsistencies because the PWM Expansion is a feasible, less damaging alternative that will adequately provide water and protect the public welfare.

Luster, Tom@Coastal

From: greg@gregsfineart.com
Sent: Tuesday, September 08, 2020 12:12 PM
To: CalAmMonterey@coastal
Subject: Cal-Am's Desal project.

Please deny Cal-Am's Desal project.

Greg Hanlon, homeowner, 672 Van Buren Cir., Monterey, Ca., 93940

Gabriella Ulloa
gulloa@csumb.edu

4th September 2020

California Coastal Commission
455 Market Street
Suite 300
San Francisco, CA 94105

Dear California Coastal Commission,

My name is Gabriella Ulloa and I am writing to express my thoughts regarding the Cal-Am desalination project. This project has sparked much controversy which is why I feel it is necessary for the public to voice their opinion. I am not a proponent of the Cal-Am desalination project and my arguments against the desalination plant are below. I am in support of the Pure Water Monterey Expansion Project.

First off, the desalination project presents economic concerns. The desalination plant would cost $2 billion dollars in total, at a rate of $6,000 per acre foot. The desalination plant costs around 2 to 3 times as much as the recycled water from the Pure Water Expansion Project. The desalination plant is also an expansion of an additional 2,250 ft and this expansion would cost $90 million. Cal-Am's Project unnecessarily provides excess water at a much higher cost so it is more reasonable to approve the project which will provide lower rates for customers, this being the Pure Water Monterey Expansion Project. It is important to consider the large majority of low-income ratepayers in this decision since the price of water has always been of concern in this area. Water is a basic necessity and should not be priced at such a high rate when there is an feasible, sufficient, and less expensive option provided by the Pure Water Expansion Project. It's a shame that nearby communities working in the local area can't afford to live here because of

poor water policy for decades and for this reason the Pure Water Expansion Project should be approved.

Secondly, Cal-Am's Project would emit an excessive amount of greenhouse gases in comparison to the Pure Water Expansion Project. The Desalination Project is expected to emit 4,990 metric tons of carbon dioxide per year; meanwhile, the Pure Water Expansion project is projected to emit a much smaller amount of carbon dioxide at a rate of 2 metric tons per year. This proves that the Pure Water Project is much less carbon intensive. The Pure Water Project is a much more environmentally sound choice because the recycling water plant purchases electricity from the Monterey Regional Waste Management District. The MRWMD utilizes biogas produced by the decomposition of waste material in the landfill to produce electrical energy, making this a more sustainable source of energy.

Finally, Cal-Am's Project would pose an environmental injustice by disproportionately impacting the community of Marina with the construction of the desalination plant in this city. Meanwhile, Marina would not be able to enjoy the benefits of the desalination plant since they are not a part of the service area. Marina is already an underserved community and was hoping to use the property at the CEMEX site for recreation and enjoyment instead of it being utilized by Cal-Am's Desalination Project. Equality for all people should be of great influence in this decision in order to create a more just society by lessening the strain in underserved communities.

I hope this letter impacts your decision in denying the construction of the plant. We need a water supply immediately and the Pure Water Expansion Project proves itself to be a feasible and less environmentally damaging option.

Sincerely,

Gabriella M. Ulloa

Luster, Tom@Coastal

From: Shirley Svetich <2shirleysvetich@sbcglobal.net>
Sent: Tuesday, September 08, 2020 12:08 PM
To: CalAmMonterey@coastal
Subject: 9/17/2020 Coastal Commission Hearing concerning CalAm's Desal Project

To the Members of the Coastal Commission Hearing,

My name is Shirley Svetich, and I have been a Marina manufactured home owner since July 2000. I am very concerned about CalAm's Desal Project in Marina, especially because of the study results. And, so should you if you really care about Marina and it's residents.

The following is mainly quoted from the City of Marina's report: Our water comes from Marina's groundwater basin, which is over-drafted, and CalAm's project wants to take up to 15 million gallons per day to supply Monterey Peninsula customers (of which we are not even included). The Stanford University study and other studies indicate that CalAm's desal project may deplete and/or contaminate our groundwater. If it is contaminated, the city of Marina may be forced to purchase water from CalAm, which is the highest price in the nation. Their project would threaten our coastal dunes, the wildlife habitat, and our beachfront recreation area.

These actions would be an unconscionable, over-reach, showing their desire and plan to have a monopoly control of water in this area (in spite of the evidence of being detrimental), and then be so money hungry as to charge their customers for their own water. Any just person could see that this is totally wrong.

I suggest they pursue an alternate solution: such as The Expansion of the Pure Water Monterey Project, which is capable of replacing CalAm's desal at a fraction of the cost and with no coastal impacts. It would use Monterey One Water's existing advanced water recycling facility to produce highly purified water, which is then stored in the Seaside Groundwater Basin for CalAm customers. This would not harm Marina's water supply, and it preserves use and enjoyment of our beautiful California coast.

I respectfully request that justice prevail by rejecting this CalAm Desal Project proposal.

Sincerely,

Shirley A. Svetich
Marina, CA 93933

Luster, Tom@Coastal

From: Yunuen <yuyudelcastillo@gmail.com>
Sent: Tuesday, September 08, 2020 12:07 PM
To: CalAmMonterey@coastal
Subject: Cal Am Desal permit

To whom it may concern:

I'm a Pacific Grove homeowner and longtime resident of Monterey county. I'm writing to let you know that I'm very concerned about the future of our water resources. Yes we need water, but we don't need this desal plant. There is a far better alternative. Expanding the Pure Water Monterey project is the most cost-effective and environmentally sound solution. Please deny Cal Am's desalination permit.

Thank you sincerely,

Yunuen Del Castillo
Sent from my iPhone

Luster, Tom@Coastal

From: Andy Walling <awalling@csumb.edu>
Sent: Tuesday, September 08, 2020 12:06 PM
To: CalAmMonterey@coastal
Subject: Marina Slant Wells: A Dishonest Project

To whom may have authority:

The fact that a privately owned company owns and has mismanaged a water utility, willfully violating the law for decades and overdrawing natural sources it was required to protect, now intends to annex a neighboring community's water supply to continue over-charging its customers is hard to accept. It is even harder to accept that it has gained this much support from politicians and big business, and it is taking community outrage to point out how wrong this is, both legally and ethically.

I am writing to point out something which should be obvious to even the most casual observer:

The proposed intention of this project is outright dishonest. If the goal is desalination of seawater, it is unnecessary to pervert an already overburdened overdrawn aquifer which is owned by another community. Cal Am has no right to the proposed location or the water which it is intending to use. The location already has been designated for other purposes by the local governing body. This manipulation is exploiting the desperation of one community and pitting it against another for a hostile land grab and takeover of another municipal water system.

This project is being marketed as if it is good for the community and the future. Nothing could be further from the truth. Overzealous development of this fragile coastal ecosystem has resulted in water shortage which threatens the future of this area. Further destroying of a floundering watershed next door is par for the course with CAL AM.

The desal initiative is clearly motivated by greed. Allowing the lack of accountability, competence, planning, and consideration for local ecology (let alone the LAW) by CAL AM which has resulted in this situation to be rewarded with such allowance would be a failure of local government and conscience.

There are other ways to solve the water issues faced by the peninsula communities without compromising adjacent watersheds.

Please stand against this hostile takeover of public resources by a private corrupt institution, and on the right side of history.

Look where else in CA that Desal has FAILED the community:
Avalon
Huntington Beach
San Diego

https://www.voiceofsandiego.org/topics/science-environment/desal-plant-producing-less-water-promised/

Andy Walling
Network Pathways Analyst
California State University Monterey Bay
100 Campus Ctr, Building 41
Seaside, CA 93955
(831)-582-3336

Luster, Tom@Coastal

From: Profile image Kevin OBrien <kmobrien1@sbcglobal.net>
Sent: Tuesday, September 08, 2020 11:56 AM
To: CalAmMonterey@coastal
Subject: Cal-Am Permit

Please deny Cal-Am's pending permit application before the board.

Thank you,

Kevin O'Brien
24520 #2 Outlook Drive
Carmel, CA 93923

Luster, Tom@Coastal

From: Patricia Marshall <pmarshall@redshift.com>
Sent: Tuesday, September 08, 2020 11:54 AM
To: CalAmMonterey@coastal
Subject: Deny the Cal Am Desal Plant Permit

I am a 30+ year resident of Pacific Grove. I've followed our water issues throughout this time. I am very much opposed to the Cal Am desalination plant. Yes, we need water, but we don't need Cal Am's desalination plant. There is a far superior alternative. Expanding the Pure Water Monterey project is the most cost-effective and environmentally sound solution. I urge you to deny Cal Am's desal plant. Your decision will affect the cost of water for decades to come. So too will your decision affect the well-being of our environment for years to come, perhaps even permanently. Thank you. Patricia Marshall

Luster, Tom@Coastal

From: Michael Baer <mgbisme@yahoo.com>
Sent: Tuesday, September 08, 2020 11:52 AM
To: CalAmMonterey@coastal; Luster, Tom@Coastal
Subject: Baer final comments again

I was told that comments should be sent as straight email rather than attachments so here they are again. Sorry for the burden, I know you are getting tons of comments, but I just want to ensure these words are seen by the Commission.

Regards,
Michael Baer

September 5, 2020

Dear Chairman Padilla and Commissioners of the CCC,

...and so, we come to the culmination of a long six-year process that I have been involved in every step of the way. I'm going to treat this letter as if I had 5 minutes to speak, to keep it under 1,000 words...

My name is Michael Baer. I was a resident of the Monterey Peninsula from August of 1982 until May of 2019... over 36 years. I moved to San Jose, the town I grew up in, in May of 2019 to help my ailing parents. I have remained active in the Monterey Peninsula Water Supply Project (MPWSP) despite the move. This is too important to me, and I have invested too much time and energy to stop merely by changing my address 70 miles north.

I first became involved in the local water issues in November of 2013, so I had already been at it a year, when I came to that fateful meeting in Half Moon Bay in November of 2014, where the Commission considered the decision of the test slant well permit, which was approved. Thus began an odyssey, and those Commissioners who have been around these last six years, probably recall me chasing you all over the state on this issue.

So here we are again... and likely for the last time.

Staff got it right, please deny the local coastal permit for the desal plant. Do your substantial part to bring this nightmare to a close.

There is so much wrong with this project which is amply and cogently covered in the staff report. You will no doubt be hearing the numerous arguments from many dozens of advocates commenting against the plant, as well as the handful of tired and misleading arguments from the proponents for the desal.

With so much to cover, the question is where to point the laser. I always try to add a novel perspective, or at least present in a novel way, to actually add value to your deliberations. What can I say now that we have reached this point?

I want to talk about the other side, the business and political allies that Cal Am has cobbled together for support.

On the political side, you "old timers" will recall, that a JPA was formed called the Monterey Peninsula Regional Water Authority (MPRWA) comprised of the six Peninsula mayors from the six Peninsula cities (Monterey, Seaside, Carmel, Pacific Grove, Del Rey Oaks, and Sand City). The fact that a community of less than 100,000 people is divided into six city jurisdictions (not to mention an additional nearly ten thousand county residents within Cal Am's borders) is one of the main reasons Cal Am can create so much mischief. There are so many different stress points they can exploit politically and financially.

The MPRWA was often referred to as "the mayors authority" and it was the brainchild and chaired by Jason Burnett, who was the mayor of Carmel; a young aspiring politician; grandson to David Packard of Hewlett/Packard, nephew to Julie Packard, the director of the world renowned Monterey Bay Aquarium. He developed a unanimous coalition of all the mayors, with the mission to unify the Peninsula to meet their long-standing problems of sufficient, sustainable water supply and resolve the CDO from the SWRCB to reduce the draw from the Carmel River.

Jason Burnett admitted more than once publicly that the "mayor's authority" had no actual authority. They were not beholden to their respective city councils nor the constituents who voted them to office. They simply worked as self-appointed lobbyists to help resolve the water supply problem in their self -perceived interests, which coincidently aligned with Cal Am wholeheartedly.

As previously mentioned, there was no representation for the county residents in unincorporated Carmel Valley, Carmel Highlands, or Pebble Beach, nor any other unincorporated areas in Cal Am's district.

Do you want to know who else wasn't at the table? Every single person who has been clambering before you to kill the project for the last six years.

I think it's instructive to note that not a single one of the six mayors on the MPRWA who came to you in 2014 was an elected official after the 2018 election. Some retired, and some were defeated. The first to leave was Jason Burnett himself, who retired in 2016 and took his family to Washington D.C.

That is the political side of the story, but there's also the commercial interests. Hospitality, Real Estate, and the local Chambers of Commerce make up the lion's share, but there are other smaller, sometimes non-profit interests, who support Cal Am. Salinas Valley Agriculture is the largest business sector in the County; they support Cal Am too, even though they are entirely outside the boundaries of Cal Am's customer base. Why do they care so much, and flex their muscles? I'm not entirely sure.

But I submit to you that every single proponent for the project, from those listed above, to Paul Bruno of MPE which has a multi-million dollar contract to trench the pipelines, to Castroville Services District, which would receive water at about 2 cents on the dollar to produce it, to low wage employees of the hospitality industry who will tell you they need that water so they can have a job...

All of them, every one, if you dig deep enough you will find they receive some financial benefit, while very few of them will see the cost on their water bill as residents, because few are residents within the Cal Am district.

This is the debate before you. Staff has laid out beautifully all the reasons why this project is fatally flawed. We've been saying it for the last several years.

Thank you for your service, your time, and your consideration.

Sincerely,

Michael Baer

Luster, Tom@Coastal

From: Andrew <allison.aa@gmail.com>
Sent: Tuesday, September 08, 2020 11:47 AM
To: CalAmMonterey@coastal
Subject: Desal project

CalAm has been heavily lobbying the Commission with extraordinarily misleading misinformation.
There already exists a much more cost-effective solution to the water supply problem, namely the expansion of Pure Water Now.
Staff has rightly recommended denial of the desal project, which has very little chance of meeting being completed and the Board should protect ratepayers its cost.
Andrew Allison
25420 Via Cicindela
Carmel, CA 93923

Luster, Tom@Coastal

From: Patric Zito <przito@gmail.com>
Sent: Tuesday, September 08, 2020 11:46 AM
To: CalAmMonterey@coastal
Subject: Desal Permit

Please do deny CalAm's desal permit and favor the more environmentally friendly alternative project.
Thanks

Sent from my iPhone

Patric

Luster, Tom@Coastal

From: Kevin Raskoff <kraskoff@gmail.com>
Sent: Tuesday, September 08, 2020 11:40 AM
To: CalAmMonterey@coastal
Subject: Deny Monterey Desal Project

Commissioners,
As a resident of Del Rey Oaks, and part of the service area of California American Water Co. water in the Monterey Bay area, I would like to urge you to deny Cal Am's request for the local desalination project.

Cal Am's strong lobbying aside, the data clearly shows that the expanded Pure Water wastewater treatment options should be completely built out before any desal is attempted in our area. There are many economic arguments for this choice but as a marine biologist, I would like to highlight the huge environmental toll that the desal project would pose from the massive power requirements and complex brine dilutions. If (when?) the brackish intake water fails to provide the needed flow to fully dilute the brine to ocean salinities, what will happen to the outflow going into the Monterey Bay National Marine Sanctuary? Either the desal will significantly be restricted, or the hypersaline brine will be released into the bay.

We have better, cheaper, more sustainable, and lower-hanging fruit to try before any desalination should be attempted in Monterey. We need to allow for a few years of data collection with full wastewater reclamation before following this path. All current estimates show that we will have the water needed to abide by the Carmel River restrictions and meet the region's needs without desalination. Shouldn't we all try this first?

Thank you for your time,
Kevin Raskoff

Luster, Tom@Coastal

From: tward74058 <tward74058@aol.com>
Sent: Tuesday, September 08, 2020 11:36 AM
To: CalAmMonterey@coastal
Subject: Desal

Please do not allow Cal Am Water to persuade you to keep their stockholders happy. We need affordable, reliable water and a public water utility that will care about the consumer.
Thank you,
Tim Ward

Sent from my Verizon, Samsung Galaxy smartphone

Luster, Tom@Coastal

From: Tony T. <t.tollner@yahoo.com>
Sent: Tuesday, September 08, 2020 11:31 AM
To: CalAmMonterey@coastal
Subject: Cal Am Desal

Coastal Commissioners,

I have lived here for 35 years and during that entire time, Cal Am has been promising a new water source.
They have yet to deliver.

Pure Water Monterey has proven itself to be a viable alternative and the logical option when it comes to reducing our pumping of the Carmel River basin.

Cal Am's desal plant concept is overpriced, well past its "due date" and bad for our community.

Please deny Cal Am's request for a desal plant and stick with the Proven alternative.

Thank you,
Tony Tollner

This is from my phone and sometimes, Siri and/or my thumbs don't cooperate. Please excuse any typos. Thanks,

Luster, Tom@Coastal

From: Susan <achasta@gmail.com>
Sent: Tuesday, September 08, 2020 11:22 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear California Coastal Commissioners, Executive Director John Ainsworth and staff,

My husband and I own a home in Marina. I am a retired faculty member having taught at CSUMB for 15 years. I am still a practicing archaeological consultant and have a background in the history of Monterey County and I understand the environmental challenges to the region. My husband, Jonathan Nasaw, and I oppose the slant wells that are under consideration by the Commission.

As citizens of Marina, we ask that you please deny this harmful project. Thank you!

Please read the following scientific evidence from Citizens for Just Water. We do not want this project. We are adamantly opposed.

CalAm has no groundwater rights and the experimental Slant Well extraction of groundwater will cause further harm to an aquifer in overdraft. Cal Am's desal project relies on using Marina's groundwater to feed their experimental desalination project for the Monterey Peninsula Water Supply Project. Cal Am does not have water rights to this water. A Stanford groundwater study shows that this project will cause harm to the aquifer which is already identified as "critically over drafted". The project will impact our beaches and federally recognized threatened wildlife but serve no water to Marina. Our community was not asked if we

wanted this project. It is being forced on our less wealthy community to serve the peninsula hospitality and real estate interests.

Please stop this injustice!

Respectfully,
Susan Morley, MA., RPA

Luster, Tom@Coastal

From: Ron Weitzman <ronweitzman@redshift.com>
Sent: Tuesday, September 08, 2020 11:15 AM
To: CalAmMonterey@coastal
Cc: waterplus@redshift.com
Subject: Water Letter in Today's Herald

Suspicious of postcard ask

A black and white large postcard came to me and my neighbors in Seaside asking us to write to the California Coastal Commission (CCC) to support the Monterey Peninsula Water Supply Project. The postcard made me feel suspicious. Upon checking, I realized it is asking me to write to CCC to support the desalination project of California American Water.

The cost of water of the proposed desalination project is more than three times the cost of water produced by recycling. The postcard is attempting to mislead its readers to write to CCC to support desalination.

I wonder how many unknowing readers have been misled. I also wonder why Cal Am would not come out openly to tout its desalination project which it has been pushing hard everywhere.

— *Sylvia Shih, Seaside*

Luster, Tom@Coastal

From: Kathryn Maurer <bitsyrn@sbcglobal.net>
Sent: Tuesday, September 08, 2020 11:15 AM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project.

Commissioners,

I can not urge you strongly enough to deny Cal Am's desal permit.This project is not in the public interest and there is an environmentally superior alternative in the expansion of Pure Water Monterey.

Pure Water Monterey is the superior choice as it is already in operaton with Phase 1. It will give us the additional water we need to stop illegal diversions from the Carmel River by the December 2021 deadline. By expanding Pure Water Monterey would give us the water we need for growth. And it would lift the moratorium much sooner than Cal Am's desal.

FACTS:
After December 2021, only 3,376 acre-feet (AF) of water can be legally taken from the river. But because of the 3,500 AF of new water available from Pure Water Monterey, we can meet that deadline with a surplus. This will stop the illegal withdrawals and protect the River.

The decades long environmental problem on the Carmel River will be solved not by the disastoris Cal Am desal plan but with an enviromentally sound Pure Water Now plan.

FACTS:
If the Pure Water Monterey Expansion of 2,250 AF were added to the current 3,500 AF from Pure Water Monterey – Phase 1, along with our legal River withdrawal of 3,376 AF and other available sources, the total available would be 11,700 AF. We only use 9,825 AF annually. That would lift the CDO and give us 1,875 AF of surplus water for growth. If history is any indicator this will give us enough water for a minimum of 20 to 30 years.

Please deny Cal Am's Desal Project on Sept 17.

Thank you,

Kathryn O Maurer
Pacific Grove, CA.

Luster, Tom@Coastal

From: Jerry Takigawa <jerry@takigawadesign.com>
Sent: Tuesday, September 08, 2020 11:12 AM
To: CalAmMonterey@coastal
Subject: Deny Cal Am's Desal Project.

Dear Commissioners,

I respectfully submit that Cal Am's Desal Plant be denied at the upcoming September 17th meeting. I agree with the Coastal Commission's Staff Report reasoning to deny such a solution.

Sincerely,

Jerry Takigawa

Jerry Takigawa
Takigawa Design
225 Cannery Row Ste 22
Monterey, CA 93940
831-372-7486
831-601-9600 M
takigawaphoto.com
takigawadesign.com

Luster, Tom@Coastal

From: Maxine Reneker <mreneker@pacbell.net>
Sent: Tuesday, September 08, 2020 11:11 AM
To: CalAmMonterey@coastal
Subject: Desalination Plant

I am writing to ask you to deny the permit Cal Am is requesting for a desalination plan to supply water to the Monterey peninsula.

I recently received a card from Cal Am, which is full of misinformation, and is typical of the kind of publicity they have been sending out, full of data that is mis-interpreted. For many years, they have been negligent in providing appropriate sources of water to the peninsula. I believe they want the desalination plant to greatly increase their assets in order to make it harder for rate payers to buy them out, as much as to provide water for the peninsula.

I have lived on the peninsula for over 25 years, and have watched their poor record, and increasing water rates.

Please deny their request for a permit for the desal plant.

Maxine Reneker
740 Dry Creek Road
Monterey CA 93940

Sent from Mail for Windows 10

Luster, Tom@Coastal

From: Bobby Latino <bobbylatino17@gmail.com>
Sent: Tuesday, September 08, 2020 11:08 AM
To: CalAmMonterey@coastal
Subject: Cal Am Desal Permit

Commissioners,
I urge you to deny Cal Am's permit for a desal plant as it provides the burden of cost onto existing customers. Right now economically is not a time to a to put more of a financial burden onto customers. As is, the customers pay already some of the highest rates in the nation and these customers also happen to be some of the most water conservative customers in the nation as well. Why punish these customers? Represent what is right by the customers and your constituents.

Sincerely,
Robert Latino
5 Cummings Drive
CV, CA 93924

Sent from my iPhone

Luster, Tom@Coastal

From: billie lee brown <billielee45@gmail.com>
Sent: Tuesday, September 08, 2020 11:07 AM
To: CalAmMonterey@coastal
Subject: Please deny Cal Am permit

Please deny Cal Am's desal permit.This project is not in the public interest and there is an environmentally superior alternative in the expansion of Pure Water Monterey.

They do not have our community's interest in mind, only profit.

thank you,
Billie Brown
410 Congress Ave, Pacific Grove, CA 93950

Luster, Tom@Coastal

From: Nancy Green <ngreen1897@aol.com>
Sent: Tuesday, September 08, 2020 10:55 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

This letter is in support of the Pure Water Monterey Expansion project as the superior alternative to Cal-Am's slant well desalination project. The PWM Expansion project cost far less than desal, is less harmful to our precious environment and will supply water faster.

Continuing forward, I will emphasize a few rebuttals to the Carmel Steelhead Association (CSA) argument for the desal plant against PWM Expansion.

The CSA made many false claims beginning with the amount of water the various water sources will produce. CSA claims if there is no desal plant, the Monterey Cal-Am district will be 2,000 afy short of water,however this is false because we will be 500 afy in surplus.

CSA claims the Monterey One Water board voted twice not to approve the EIR for the PWM Expansion Phase II. This is false because the vote to certify failed and the vote not to certify also failed, both with an 11 to 10 weighted vote.

CSA claims the desal plant is expandable while the PWM Expansion is not expandable.and that the volume is not guaranteed. This is false because the PWM Expansion amounts to 2,250 afy of expansion and the water is guaranteed! In Phase 1 of the PWN project, the Carmel River will be restored by taking less water mandated by the California Water Resources Control Board and by taking less water it helps to restore the steelhead.

As a resident of the Monterey Peninsula for over fifty years and a retired attorney, I find the CSA's claims misleading, discrediting and an attempt to obscure the facts.

Sincerely,

Nancy W Green,
Attorney at Law, ret'd

Luster, Tom@Coastal

From: v. wayne thompson <vwayne.thompson@live.com>
Sent: Tuesday, September 08, 2020 10:44 AM
To: CalAmMonterey@coastal
Subject: Denial of California American Water's Application for a Coastal Development Permit

To: California Coastal Commission Chair, Commissioners and Staff

I hereby urge the California Coastal Commission (Commission) to NOT approve California American Water Company's request to proceed with their planned desalination plant. Not only do I feel a great lack of trust in the manner in which this company has executed the planning and testing aimed at securing approval for this plant, but I also believe that a viable alternative to this plant exists that better serves the interests of all of the citizens of the entire Monterey peninsula community.

Having worked for over 45 years for a large engineering and construction company, I have extensive experience in the specification, design and construction of complex mechanical equipment and systems. I have learned (often the hard way) that it is not sufficient to merely trust that suppliers of equipment or services can satisfy the requirements established for a project based on the typically brief statements made in their proposals. Verification of the credentials of a supplier, both technical and commercial, are paramount. All work being tendered must be fully specified and the performance of the equipment and attendant systems must be clearly stated and backed up by a written warranty. Above all, the supplier must provide references for past work performed that will fully corroborate successful performance on past projects similar to the one being proposed.

In my review of literature available to the general public regarding the design and specification of the proposed CalAm desal plant, I find that little specific information has been presented both for the drilling of the extraction wells and for the design and operation of the desal plant itself. The company selected to drill the extraction wells for the CalAm desal project has limited experience in drilling slant wells in the environment and for the overall capacity associated with this project. Again, as I have learned in my work experience, bigger is different. The test wells that were drilled for the purpose of confirming the viability of the drilling technology did not correctly follow the planned methodology nor did the results address all of the required performance criteria. I do not find the proposal for the planned desal plant to be worthy of acceptance without additional testing and verification of the full specifications defining the design, engineering and "warranted" performance of the entire plant.

Fortunately, there is a viable alternative to the proposed CalAm desal plant. The alternative is the Expansion of the Pure Water Monterey (PWM) water reclamation plant. The base PWM plant, capable of producing 3500 acre-feet of highly purified reclaimed water, has been built and is in commercial operation. The PWM Expansion would produce an additional 2250 acre-feet of water which, along with approved draws from other sources, should more than satisfy the current and future water consumption requirements for the areas served by CalAm, based on accepted water consumption forecasts. The PWM Expansion project provides a host of advantages when compared to the CalAm desal plant. Both initial construction costs and ongoing operation costs would be substantially less for the PWM Expansion project than for the CalAm desalination plant project. This will equate to much lower costs for the ratepayers (of which I am one). Finally, the negative impact on the environment will be much less for the PWM Expansion as compared to the CalAm desal plant; much less air and water pollution; less visual pollution at the coastline, and less seawater intrusion into the aquifers presently supplying groundwater to the surrounding communities.

Thank you for your consideration.

Victor Thompson
Carmel, CA 93923

Luster, Tom@Coastal

From:	Ron Weitzman <ronweitzman@redshift.com>
Sent:	Tuesday, September 08, 2020 10:34 AM
To:	CalAmMonterey@coastal
Cc:	Luster, Tom@Coastal
Subject:	Evaluation of the Ground Water Modeling for the Cal Am Monterey Peninsula Water Supply Project
Attachments:	GeoHydroScienceWRAMPrptAugust14 .pdf

Coastal Commission:

For your consideration in making your decision on granting or denying approval of Cal Am's application for a coastal development permit, I am submitting the attached **Evaluation of the Ground Water Modeling for the Cal Am Monterey Peninsula Water Supply Project** by hydrogeologist Barbara Ford, who specializes in modeling. I originally consulted with Ms. Ford to help me find out how data used in modeling might have been altered to produce the negative correlation (-0..45) between estimates and errors I discovered in the Geoscience data on the 180-foot aquifer. I learned that the alteration occurred in the "adjustment" of what hydrogeologists call "parameters" – which are the values of what statisticians call independent variables used in modeling to make estimates of dependent variables, in this case water levels. It is that adjustment, made to reduce error variation, that created the negative correlation I observed. An error, by definition, is the portion of a measurement that a model cannot estimate and so errors should have no correlation with estimates. Ms. Ford was so helpful and had devoted so much time to her study of the MPWSP modeling that I asked her to write a report for Water Plus evaluating that modeling. The attached evaluation is her report (14 August 2019).

Most respectfully,

Ron Weitzman

President, Water Ratepayers Association of the Monterey Peninsula (aka Water Plus).

Evaluation of the Ground Water Modeling for the Cal Am Monterey Peninsula Water Supply Project

Prepared for Dr. Ron Weitzman, President
of the
Water Ratepayers Association of the Monterey Peninsula

Prepared by Barbara Ford, PE*, GeoHydroScience llc

August 10, 2019

*CO

1.0 Introduction

1.1 GeoHydroScience Objective

Modeling is essential for accurate prediction of the environmental impact of proposed slant well pumping in the California-American Water Company (Cal Am) Monterey Peninsula Water Supply Project (MPWSP). That project underwent two draft environmental impact reports (EIRs), one in 2015 and one in 2017.[1] Each report contained an appendix on modeling identified as Appendix E2. The first was prepared by Geoscience Support Services, Inc. (Geoscience) and the second by HydroFocus Inc. (HydroFocus), collectively referred to as the consultants. I have been informed by Dr. Weitzman of the following:[2]

> The second (H-E2) was created at least partly in response to critical comments on the first (G-E2) by Dr. Ron Weitzman, president of Water Plus, a party to the proceeding on MPWSP. The final project EIR contained H-E2 and a chapter (Chapter 6) consisting of responses to critical comments on the second draft, including comments by Dr. Weitzman on H-E2. According to Dr. Weitzman, the California Public Utilities Commission has not held any evidentiary hearings on the second draft or the Chapter 6 responses in the final EIR. Because Dr. Weitzman considers the EIR modeling to be seriously inadequate, as well as professionally uncontested, he has filed a lawsuit challenging the usefulness of the EIR to determine the environmental impact of MPWSP.

Under these circumstances, for assistance in that suit, Dr. Ron Weitzman has hired Barbara Ford, PE[3] of GeoHydroScience llc, as an expert in hydrogeology and modeling to review both G-E2 and H-E2, and write a report.

1.2 Information Reviewed

Because of the short timeframe as a consequence of Dr. Weitzman's communicated difficulty in acquiring assistance in California as a consequence of conflicts of interest, my review was necessarily limited to only the documents identified below:

- Water Ratepayers Association of the Monterey Peninsula and the State of California Amended Complaint for Damages and Civil Penalty and Demand for Jury Trial, Case No.:16CV001561, Draft April 12, 2019.

[1] Communication with Dr. Weitzman on August 8, 2019.
[2] Ibid.
[3] Barbara Ford, author of this report is a licensed Professional Engineer in Colorado and Arizona.

- Geoscience Support Services, Inc. April 17, 2015. Appendix E2 Monterey Peninsula Water Supply Project Groundwater Modeling and Analysis. Prepared for California American Water and Environmental Science Associates. It includes Appendix A - Luhdorff and Scalmanini, Consulting Engineers, March 2015. Monterey Peninsula Water Supply Project Using the Salinas Valley Integrated Ground and Surface Water Model. Prepared for Geoscience.
- HydroFocus, Inc., August 31, 2017. Appendix E2 North Marina Groundwater Model Review,Revision, and Implementation for Slant Well Pumping Scenarios. Prepared for Cal Am Monterey Peninsula Water Supply Project.

1.3 Information Not Reviewed

Of significance to this review, there is additional information that has not been reviewed for the reason stated. The following is a partial list of items not reviewed.

- Data and data analysis reports
- Source data
- Model files
- CEMEX model report and files
- Responses to Comments to the Final Environmental Impact Report

Accordingly, my report can only assess the model based on the information reviewed, and weighing that information across the reports and against standard modeling practice as appropriate.

The last item in the list, Responses to Comments was made available to me on July 26, late in my review and only just prior to report preparation. While time did not allow for sufficient review of that document, I was able to identify that some concerns by other reviewers similar to my own were addressed to an unknown extent by the consultants (because of my limited time not allowing for a comprehensive review). To the extent that the consultants comments have not adequately addressed, mitigated or corrected each of the items described in this report, my opinions on that particular item remain relevant.

2.0 Model

2.1 Reliance on Salinas Valley Integrated Ground and Surface Water model (SVIGSM)

The Geoscience modeling relied on an updated calibration of the SVIGSM model by its subcontractor, Luhdorff and Scalmanani, Consulting Engineers (LSCE). Geoscience extracted a portion of the area of the SVIGSM model to construct the North Marina Ground Water Model (NMGWM) and adapted it to estimate the drawdown impacts to the aquifer system resulting from proposed slant well pumping along the coast at the CEMEX site and the Potrero Road site. HydroFocus adopted the Geoscience model, adjusted parameter values among other revisions to produce a calibrated model, concluded that the NMGWM boundary conditions, pumping and recharge were in error and instead relied on superposition to predict drawdown from proposed slant well pumping.

The LSCE focus was as follows (excerpt from LSCE, p.1):

> This report focuses on documenting the extension and recalibration of the SVIGSM along with the predictive scenario results of the MPWSP generated by the SVIGSM with a focus on the influence the MPWSP has on Salinas River streamflow and interaction with underlying groundwater aquifers in the Pressure and East Side subareas of the Salinas Valley.

2.2 Limitations in SVIGSM Calibration

LSCE identified the methodology employed to update the SVIGSM calibration. Of significance, primarily because of the subsequent reliance on SVIGSM water levels for assignment of boundary conditions in NMGWM, the LSCE calibration was necessarily limited to only revising and updating system stresses including aquifer recharge and discharge, but excluded updating of the aquifer properties[4] because elements of the existing SVIGSM were inaccessible (see excerpt below, LSCE pg.2):

> The intent of the recalibration effort was to retain the existing model framework and aquifer properties as originally conceptualized by Water Resource and Information Management Engineering, Inc. (WRIME) and MCWRA due to the inability to obtain the SVIGSM source modeling code.

Also from LSCE (pg. 11; underline added for emphasis):

[4] such as hydraulic conductivity (K)/transmissivity(T), and specific storage(Ss)/storage coefficient (S); T and S reflect the K and Ss across the aquifer thickness.

> The intent of the model extension and recalibration effort was to retain the existing modeling framework and aquifer properties and any adjustments that were necessary to recalibrate the model focused on recharge and discharge input values.

Presumably LSCE would have chosen to update aquifer properties to capitalize on the new data available since the last SVIGSM calibration. LSCE provided the following SVIGSM output for the NMGWM model (excerpt, pg. 13):

> SVIGSM calibration outputs were provided to Geosciences for incorporation into the NMGWM. These outputs included monthly output of groundwater levels at SVIGSM nodes located along the edge of the NMGWM domain, groundwater pumping by element, deep percolation by element, and streambed infiltration by stream node. These data were incorporated into the NMGWM for use in model calibration.

LSCE modified the pumping in each model layer based on observed water level data, as described in the following excerpt (LSCE pg. 11):

> During the model calibration, the vertical distribution of groundwater pumping was adjusted to more closely simulate the observed conditions within all three (3) model layers based on water levels at calibration wells. Groundwater levels in each calibration well individually reflect conditions in distinct depth intervals corresponding with different model layers. Accordingly, the hydrographs of simulated and observed water levels for calibration wells were used as guidance in making adjustments to the vertical distribution of pumping for different time periods during the updated model calibration period.

While much of the LSCE data preparation for the model update was reasonable, this re-allocation of pumping during the calibration is problematic. It is not clear that this practice was done model-wide or only for select wells as the report did not provide sufficient information. If the justification for this application was for only wells which spanned multiple aquifers (multi-completion wells), a more defensible approach would have been to employ an equivalent method as that available in the Modflow multimode package which dynamically allocates pumping depending on the layer water level (head), the transmissivity and the storage characteristics (if a transient model). Reallocation by using only the observed water level, presumes the aquifer properties are known and correct in the model. If not, the pumping reallocation based on the observed water level as the guidance, is incorrect. Because the NMGWM calibration would subsequently revise aquifer properties, while retaining the SVIGSM pumping allocation, but also in accordance with the observed water levels, the pumping allocation would be erroneous. Not only that, the calibrated aquifer properties would also be potentially erroneous, because of their dependence on the erroneous stress.

LSCE presented no stream gain-loss data in its report to support its estimation of the streambed infiltration used in the calibrated model, but like the pumping, it was a calibration parameter. But because stream gain-loss data was not presented, it is indeterminate if the calibrated recharge distribution was accurate. Sensitivity analysis of calibrated values was not presented, so the uncertainty is unquantified.

2.3 SVIGSM and NMGWM Inconsistencies

NMGWM is reliant on the recharge and discharge distributions from the updated SVIGSM calibration. Geoscience explicitly states adoption of those stresses, consistent with the LSCE report as follows (excerpt from Geoscience report pg. 27):

> Monthly data for deep percolation from precipitation, stream recharge and groundwater pumping in the NMGWM area as well as the water levels assigned for the general head boundaries during the calibration period were obtained from the SVIGSM.

Geoscience describes the following calibration process (excerpt pg. 28):

> The calibration process involved adjusting model parameters until the model provided a reasonable match between the simulated and measured parameters. These aquifer parameters included horizontal hydraulic conductivity, vertical hydraulic conductivity, effective porosity, and the storage coefficient.

A side-by-side comparison of the aquifer properties in the two models (SVIGSM and NMGWM) is not presented by Geoscience or HydroFocus and because LSCE did not present the aquifer properties in SVIGSM, I am unable to identify and evaluate the differences.

The properties are presumably different between SVIGSM and NMGWM as a consequence of subsequent parameter revisions during calibration by Geoscience and HydroFocus. Because of inadequate documentation in the Geoscience report however, the extent to which a feedback loop between Geoscience and LSCE existed is not evident. It is possible that such feedback was used and the water levels assigned at the NMGWM boundaries were consistent with the SVIGSM output, but if employed, that process may have led to other errors, potentially of great relevance to the reliability of the model results. Only because HydroFocus included water level data in the southern area of the model (south of the Salinas River), was a major discrepancy revealed between the SVIGSM calculated water level elevations and those assigned by Geoscience along the boundary condition. HydroFocus identified the error but did not correct it, and chose instead to abandon use of the calibrated head model for predictions of drawdown from slant well pumping, and employ superposition in its place.

2.3.1 Boundary Conditions

The consultants relied on the updated SVIGSM model-calculated water level distributions associated with an unknown set[5] of SVIGSM aquifer property values in order to assign the water level elevations along the general head boundaries (GHB) in the NMGWM model.

The GHB includes assignment of water levels and conductance terms to perimeter boundary cells and its function is simulation of a head distribution and prevailing gradient at the NMGWM model boundary. Accurate representation of the GHB ensures that the water level elevations in the aquifer layers are equivalent between the parent SVIGSM and NMGWM models at the boundaries. But the consultants do not report the water level elevations at the GHB. LSCE included figures of the simulated potentiometric surface showing contours of the model-calculated spatial water level elevation in the 180-ft aquifer and the 400-ft aquifer, but did not include the Dune Sand/A Aquifer/Salinas Valley aquitard potentiometric surface (SVIGSM model layer 1a). Geoscience and HydroFocus included no figures of the interpreted or simulated potentiometric surfaces for any aquifer in NMGWM so the head assigned along the boundaries could not be determined. The failure to include these interpretations is contrary to standard model (conceptual and numerical) reporting.[6] Also contrary to standard model reporting was the absence of a conceptual water budget, how well the model adhered to that budget, and definition of the method used to calculate the GHB conductance terms.

Subsequent to boundary assignment using the SVIGSM results, Geoscience and HydroFocus[7] revised the aquifer properties inside of the model area, including along the boundaries. This likely resulted in a disparity between the water level elevation assigned at the boundary per SVIGSM, and that inside of the NMGWM. But the disparity at the boundary would result in erroneous flow rates at the boundaries and to an unquantified extent, erroneous water levels inside the boundary. HydroFocus concluded the error was significant, and rather than correct the erroneous boundaries, abandoned the NMGWM physically-based head model in favor of a superposition

[5] not included in the LSCE report appended to the Geoscience report

[6] Anderson, MP, WW Woessner and RJ Hunt 2015. Applied Groundwater Modeling Simulation of Flow and Advective Transport. Elsevier/Academic Press.

[7] It is assumed Geoscience altered the parameter values after importing the SVIGSM boundary water levels because the report does not distinguish otherwise. HydroFocus did alter the Geoscience NMGWM parameter values.

model, where only the change to the water level (not the water level elevation or head) is calculated. The predictive modeling is described in Section 4.0 of this report.

Pumping

The errors in pumping introduced during SVIGSM calibration described in the previous section, were compounded in the Geoscience and HydroFocus calibrations.

Recharge

In order to accurately quantify the impacts during predictive modeling, there must first be an understanding of the stream-aquifer interaction for the conceptual model based on gain-loss data, followed by estimation of the stream-aquifer parameter values during calibration using that data, and finally, quantification of the uncertainty in the calibrated parameter values based on sensitivity analysis. But the consultants do not present this data and analysis.

Stream gain-loss estimates were not presented in the Geoscience or HydroFocus reports. The reports do not present adequate information for the conceptual model pertaining to the stream aquifer interaction, nor where or how SVIGSM stream infiltration is assigned in the NMGWM model, and how well the NMGWM represents that relationship.

It appears[8] that historic gaged flow data along the Salinas River within the SVIGSM and NMGWM areas is available, but an explanation as why gain-loss estimates have not been estimated and utilized in calibration of the respective ground water models was not provided. If such data are available, it is of high value because it reduces uncertainty in the estimated parameter values and reduces the non-uniqueness commonly confounding optimization. Nonuniqueness occurs when different combinations of parameter values match the observations equally well.[9] Furthermore, the predictions of drawdown from slant well pumping and the impact to the stream gain-loss is of critical interest as identified in both the Geoscience and HydroFocus reports. The Geoscience and HydroFocus reports did not include a demonstration that the models accurately simulate the stream-aquifer interaction.

2.3.2 Model Layering

[8] on only a cursory review of USGS online data

[9] Hill, MC and CR Tiedeman 2007. Effective Groundwater Model Calibration. John Wiley & Sons, Inc.

NMGWM includes a layer for the Dune Sand/Aquifer A aquifer[10] (layer 2), and a layer (layer 3) representing the Salinas Valley aquitard, where present. In contrast, SVIGSM combines the typically highly transmissive Dune Sand/Aquifer A unit and the very low permeability aquitard into only one layer (1a), even where both occur vertically in the project area. Because LSCE did not present the aquifer properties of this lumped layer, the disparity in the SVIGSM and NMGWM cannot be evaluated.[11] Accurate representation of this uppermost aquifer layer including the Dune Sand/A Aquifer unit is critical to the calibration and predictions made using the model, including subsequent superposition modeling. The uppermost layer has expectedly the most (if not all) interaction with the recharge stresses, including stream gains and losses, precipitation recharge and other deep percolation.[12] Because SVIGSM revised the recharge distribution in its calibration, it is not evident that the inconsistent representation of the uppermost aquifer unit did not result in inaccurate representation of the recharge distribution. This may be another reason HydroFocus concluded the recharge distribution was erroneous, but this was not specified in its conclusion.

Geoscience and LSCE presented no calibration data for the Dune Sand/A Aquifer unit, although Geoscience was apparently aware of the existence of this data as shown in its Figure 96. Because Geoscience and LSCE did not include any calibration data in the Dune Sand/A Aquifer unit, the level of error remains unquantified.

3.0 Model Calibration

The description of the methodology employed for model calibration in the Geoscience and HydroFocus reports is incomplete. It is not possible to determine if Modflow 2000 was used for parameter estimation using inverse techniques, or was instead used deterministically. Parameter estimation using inverse techniques includes minimization of the objective function, representing the sum of the squared residual values in order to optimize the independent variables, the parameters. The residual is the difference between the observed and calculated value.

[10] Layer 2 also houses Perched Aquifer, the Perched "A" Aquifer, the 35-ft Aquifer and the -2 ft Aquifer (HydroFocus report pg. 9) but in this report I will refer to the "Dune Sand/A Aquifer unit" for simplicity.
[11] LSCE presented no information on the aquifer property values in the SVIGSM model so that a comparison could be made with that presented in the Geoscience and HydroFocus reports.
[12] Based on HydroFocus figures, however, there may be stream infiltration to the 180-ft aquifer, although there was inadequate information in the report to make a conclusion.

Modflow 2000 can be used for either approach. Parameter estimation is the calibration process which adjusts aquifer and stress variables (typically including the aquifer hydraulic conductivity, transmissivity, storage properties and recharge, among others) within reasonable ranges, to minimize the residuals in the observed and calculated response variables (i.e. the water level, also referred to as the head, and flux/flow). Industry standard calibration was historically done deterministically but, for approximately the past 15 years, inverse techniques have become more commonly employed because of the benefits of the inverse methodology, including quantification of the parameter uncertainty and sensitivities (coefficients calculated during parameter estimation to reduce the difference between the observed and calculated values[13]) , as well as quantification of the uncertainty in predictions, among other documented benefits.[14]

Neither consultant states which of the two, or whether a combination of the two was used to calibrate the models, critical to my review. It would have been assumed that the models were calibrated using inverse techniques in that the model is expectedly amenable to inversion.[15] The absence of enormous amounts of information generated by inverse modeling from the reports suggests that perhaps only deterministic methods were employed, sacrificing a valuable opportunity to better define the system through parameter optimization and uncertainty analysis. At a minimum, the identification of which calibration method was employed, and if not employed, a legitimate reason for not using inverse methods should have been included in the report.

The objective of the NMGWM model stated in the Geoscience report (pg.8) was to "evaluate the impacts of the proposed MPWSP on the Salinas Valley Groundwater Basin. Groundwater modeling was conducted to assess the impacts of MPWSP on the groundwater levels and the seawater intrusion".

Geoscience identified the following tasks to be completed in its scope of work (pg. 8):

- Collecting and analyzing historical geohydrologic data,
- Updating and recalibrating the North Marina Groundwater Model (NMGWM), including data gathered during the exploratory borehole work (GEOSCIENCE, 2014),
- Updating and recalibrating the Salinas Valley Integrated Ground and Surface Water Model (SVIGSM; see Appendix A)
- Developing a focused CEMEX Model for the CEMEX Site,
- Developing and running various MPWSP scenarios, and

[13] Doherty, J. 2015. PEST Calibration and Uncertainty Analysis for Complex Environmental Models, pg. 62.
[14] Hill, MC and CR Tiedeman 2007. Effective Groundwater Model Calibration. John Wiley & Sons, Inc.
[15] Dry cells in modeling can present difficulties for inverse modeling, but this model expectedly did not incur this difficulty to the extent that inverse methods would have been rejected *a priori*.

- Preparing the modeling report.

3.1 Data Deficiencies and Exclusion

While additional data collection was part of the task, Geoscience included no water level data for the Dune Sand/A Aquifer unit across the entire model area. But the Dune Sand/A Aquifer unit is one of the two primary units intended for pumping in the MPWSP. Geoscience did identify the existence of well data at Fort Ord (Figure 96), but excluded it from the calibration results in the model report. Because the expanse of this unit as represented in model layer 2 excluded water level data, the Geoscience NMGWM calibration for the Dune Sand/A Aquifer unit is associated with significant uncertainty, and predictions relying on the Geoscience calibrated model are concluded to be unreliable. Model bias is also evident in the 180-ft aquifer. Only when HydroFocus included the water level data (but only in the Fort Ord area south of the Salinas River), a poor calibration was revealed. But the calibration may be poor across other areas of the model where no water level data was available to inform the calibration. HydroFocus is correct in its assertion that the model in its current condition was unacceptable for its intended objective.

Geoscience described the CEMEX modeling in its report (April 17, 2015) but monitoring and testing of the CEMEX wells was initiated at nearly the same time as the report in early to mid-April 2015. It is unfortunate that the Geoscience CEMEX modeling was not delayed until after the testing which presumably would provide significantly better data for the model.[16] Because this data was not yet available, Geoscience relied on lower quality information from sediment texture curves, which included significant and untested assumptions, to derive the aquifer parameter starting values for calibration. But equipped with no water level data and no stream gain-loss data for calibration, the model representation of the Dune Sand/A Aquifer unit remained uncalibrated, so the presumably highly uncertain values used as initial values reasonably remained equivalent or nearly so to the final values.

HydroFocus presented calibration results using the CEMEX testing in which observed and calculated drawdown were presented for its model, the Geoscience model and the CEMEX model. But HydroFocus did not report the CEMEX test estimates of hydraulic conductivity (K); horizontal (Kh) or vertical (Kv)) or the estimated specific yield/storage estimate (sy/S), or that the model used those values.[17] The model K and S values for

[16] I am unfamiliar with potential constraints on the project schedule but the nearly contemporaneous report submittal and data acquisition is noted.

[17] See Figure 3.3d

either the HydroFocus model or the Geoscience model are not compared with the valuable test-derived estimates. Of the three models, the CEMEX model most accurately simulated the test drawdown, which HydroFocus attributed to the better resolution in the CEMEX model.

The source data was not included in the reports. Neither consultant posted actual K or storage values from testing in their parameter zone maps. While HydroFocus did prepare a list of sources for its basis in the model parameter zone values, those sources are most often other modeling efforts. It is not known if the source K values are model-estimated or estimates from testing. Model-derived estimates of K through calibration, for instance, are of less reliability than a hydraulic conductivity (K) value derived from pumping tests. The consultants require that the reviewer must gather and review all source documents to extract the information that should be reported in the model report. Standard model reporting includes a description of the method used to estimate each aquifer parameter[18], which is absent in the reports.

3.2 Parameter Adjustment During Calibration

HydroFocus and Geoscience adjusted parameter values to minimize the difference between the observed and model-calculated water levels during calibration. This minimization of the objective function (water level or head residuals (errors)) is but one measure of many in determination of the calibration quality and whether the model is a sufficiently accurate representation of the aquifer system. Calibration quality assessing only the error in the water level residuals, considers only a portion of the error information, and in this case likely a small portion of the error information. The NMGWM objective function is dependent on the water level data available, and as described in previous sections, insufficient data was acquired, utilized and presented for the NMGWM model calibrations. Furthermore, the calibration process must only adjust parameters within reasonable ranges based on available data, and quantify the uncertainty in those parameter estimates during the sensitivity analysis.

But the NMGWM calibration is concluded to have significant errors besides those already presented, and they include unreasonable parameter values, insufficient data, and inadequate sensitivity analysis.

[18] Anderson, MP, WW Woessner and RJ Hunt 2015. Applied Groundwater Modeling Simulation of Flow and Advective Transport. Elsevier/Academic Press.

Because of these errors, the model is not concluded to be representative of the aquifer system. The model will be unreliable for predictions of impacts from slant well pumping, regardless of its ability to minimize the objective function.

3.2.1 Hydraulic Conductivity

Sensitivity analysis and confidence intervals for the calibrated parameter values are not reported in the consultants reports. The uncertainty in the calibrated parameter estimates is not quantified.

Geoscience updated the CEMEX model subsequently in 2016, prior to the HydroFocus NMGWM calibration (2017), and presumably reflective of the high quality data from the pumping test performed in April 2015.[19] But HydroFocus did not identify the CEMEX aquifer test estimates of the horizontal (Kh) and vertical hydraulic conductivity (Kv) values in the report, and instead relied on other (often older) reports which appear to include predominantly modeling estimates of Kh and Kv.[20] The CEMEX monitoring well network for the test appears to have been particularly well suited for determination of Kh and Kv values.

In the CEMEX and Potrero Road sites, the Geoscience initial estimates of Kh and Kv were based on an assumed relationship between sediment texture and horizontal and vertical hydraulic conductivity. The method assumptions were not subsequently validated with the CEMEX aquifer test parameter estimates. Had the assumptions been subsequently validated, an opportunity would have existed to extend that demonstrated correlative relationship to other areas of the model. HydroFocus did not provide a post-audit of the validity of the approach and assumptions, or appear to rely on that method.

In the model area primarily east, south and southeast of CEMEX, the Kh and Kv values in the Geoscience and HydroFocus models are substantially different for the Dune Sand/A Aquifer unit, the Salinas Valley aquitard (SVA), and the 180-ft aquifer. The Kv changes include up to seven orders of magnitude reduction in the newly-interpreted low conductivity material in the HydroFocus model in layer 3.

The mapped SVA (Salinas Valley aquitard) north of the Salinas River has a Kv value five orders of magnitude larger than this anomalous low Kv zone south of the river. Because this change was not associated with a defined lithologic reinterpretation in the HydroFocus report, the value appears to be unreasonable. The Kh and Kv of the Dune Sand/A Aquifer unit are also generally lower in this anomalous zone, although the Kh

[19] The pumping test at CEMEX is concluded to have been performed in April 2015 based on the hydrographs presented in the HydroFocus report.
[20] See Figure 3.3d

value is identical between the Dune Sand unit and the low conductivity zone, also potentially reflecting an unreasonable Kh value if it is permeable material.

This area is partially traversed and bordered by the Salinas River.[21] The low Kh and Kv will limit the hydrologic connection between the river and the aquifer. Because the stream-aquifer interaction along the Salinas River may be affected by the erroneous model values, and because stream gain-loss data were not presented for the calibration, the predicted impact to the River from slant well pumping is unreliable. HydroFocus excluded explicit representation of a portion of the Salinas River in this area of the model in its predictive modeling as will be described in Section 4.0.

The Kh and Kv values in the 180-ft aquifer were also revised between the Geoscience and HydroFocus models significantly south of the Salinas River and near the southern boundary. The Geoscience Kh of 160 feet per day (ft/d) was revised to 50 ft/d (western half) and 425 ft/d (eastern half) so that a much higher Kh value is assigned inland as compared to the coast. The Kv was increased more than an order of magnitude above the Geoscience model values. HydroFocus did not post/identify the specific K values used to support this set of values, so it is not possible to make a conclusion about its accuracy.

HydroFocus incorporated more water level data along the southern boundary than Geoscience which allowed for better calibration in this area of the model. However, calibration must also reflect reasonable aquifer properties, while also minimizing the residuals between observed and calculated water levels. Some of the significant parameter changes made in the HydroFocus model may have been to compensate for anomalous boundary and initial water levels prior to the evident conclusion that the water levels were erroneous and disregarded in subsequent superposition modeling.

3.2.2 Storage Values

Only a cursory review of the model storage properties has been accomplished. I did not identify any source data values in the reports to which I can compare the model values. HydroFocus referred primarily to SVIGSM, but the LSCE model report did not include S estimates. HydroFocus had not included estimates from the CEMEX aquifer test so a comparison with model values could be made.[22]

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[21] Because Geoscience and HydroFocus do not show the Salinas River on its respective parameter zone maps, I can only estimate based on a comparison across multiple figures.

[22] It is unknown whether the CEMEX testing yielded an estimate of specific yield and storage coefficient because the CEMEX report was not reviewed, and HydroFocus did not identify the values in its model report.

Accurate representation of the specific yield (effective porosity) and the storage coefficient is required for accurate predictions of the drawdown distribution and seawater intrusion. The HydroFocus values of specific storage (representing the storage coefficient divided by the aquifer thickness) as presented in Figure 3.3c appear to indicate an average model value of 0.001/ft which seems high for a confined aquifer where that exists.[23] Without any independent estimates made available by the consultants, it is not possible to conclude that the model storage values are reasonable. The model reports did not present interpreted or calculated potentiometric surface maps so areas where aquifers are confined or unconfined could not be distinguished and weighed against the storage estimates. The potentiometric surface is an imaginary surface passing through all points to which water will rise in wells penetrating a confined aquifer, and the surface is described by a series of contour lines along which the potential head is equal. The ground water flow direction is perpendicular to the contours. For an unconfined aquifer, the potentiometric surface is referred to as the water table, which defines the surface upon which the water pressure is equal to atmospheric pressure[24]. Definition of the potentiometric surface/water table is integral to understanding the hydrogeologic system.

3.2.3 Model Budget

The NMGSM hydrographs show that the initial model heads and heads at the boundaries were inaccurate for a significant portion of the simulation period.[25] The HydroFocus model flow budget presented in Figure 4.5 is inaccurate because it appears to use an average based on the inaccurate heads, as well as the erroneous pumping and recharge components. The model flow budget represents the model balance of each flow component simulated explicitly in the model, with some of the components positive (water into model area), precipitation recharge for example, and the others negative (water out of model area), including pumping as an example. Modflow numerically balances the positive and negative components with a balanced model showing a near zero difference between the two. Unbalanced or excessive flow budget error would be an indication that the flow components are not balanced, and the model is not concluded to be numerically precise. A model flow budget for the Geoscience model calibration is not included in the report. It is standard modeling practice to compare the model budget with that estimated independently depending on available

[23] Without review of source data, it is indeterminate whether 0.001/ft is an accurate value for the aquifer specific storage.

[24] McWhorter, DB and DK Sunada 1977. Ground-Water Hydrology and Hydraulics. Water Resources Publications, LLC.

[25] See HydroFocus Figure 4.1A layer 2 hydrographs.

historic data. LSCE had provided a detailed basis for some components, but the consultants did not incorporate this as part of the model calibration evaluation.

3.3 Sensitivity Analysis

HydroFocus stated the objective of its sensitivity analysis (pg. 42):

> The objective of the sensitivity analysis is to address the question: "If the assumptions adopted in developing the model were changed, would the model predictions change so as to change the conclusions regarding proposed slant well operation?"

For its sensitivity analysis, the HydroFocus report included an evaluation of the changes in drawdown in the predictive scenarios with alteration of five of nearly 50 conductivity model parameter zones.[26,27] Evaluation of the predictive uncertainty is valuable but not without an evaluation of the uncertainty in the parameter values estimated in calibration, upon which predictive uncertainty also depends. Standard reporting includes reporting the parameter sensitivity for all parameters, not only 10 percent, and from the calibration, not only from the predictive scenarios. While it was not made clear in either report whether inverse modeling was used for parameter estimation, Modflow 2000 allows for calculation of the sensitivities, as do other freely-available, coupled softwares to Modflow. Corroboration of the methodology and software is not possible without more information.

3.4 Analysis of the Residual Error

Geoscience and HydroFocus presented various report figures describing the residual error between the observed and model-calculated water level (head) values. The following observations are made based on my review of the report figures.

Dune Sand/A Aquifer unit

Of the eight wells, seven show that the model underestimates the observed water levels in the Dune Sand/A Aquifer unit. The model shows a biased low water level distribution.

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[26] HydroFocus report Figure 6.1.

[27] Sensitivity is defined as the change in the model calculated response variable (for NMGWM, the water level, or derived drawdown) associated with the change in the parameter value (i.e. K; Anderson, MP, WW Woessner and RJ Hunt 2015. Applied Groundwater Modeling Simulation of Flow and Advective Transport. Elsevier/Academic Press.). Although typically in inverse modeling, perturbation of the parameter value over a small range more accurately reflects the parameter sensitivity because the parameter sensitivity is not always linear (Hill, MC and CR Tiedeman 2007. Effective Groundwater Model Calibration. John Wiley & Sons, Inc.). HydroFocus changes to the parameter values were large, assuming linearity, and done to demonstrate only the change in extent of drawdown away from the slant pumping.

Four of the wells[28] show that the starting head in the model was as great as 70 to 80 ft in error, as compared to the observed values. While there is convergence of the observed and simulated water levels late in the simulation period at three of the wells, it is not evident that error magnitude is not increasing with time,[29] or that application of an extremely low and likely unreasonable Kv is justified and has not been applied to specifically to reduce the residuals.

At monitoring wells MW-OU2-29-A and MW-BW-01-A, the erroneous starting head is shown to rise more than 70 ft during the simulation period at the (latter) well farther in from the boundary, and 35 ft at the (former) well more proximal to the boundary, possibly distinguishing error contributions.[30] Despite the significant rise in model water levels, concluded in the report to be erroneous, the observed water levels range similarly between the wells over a 10-15-ft interval. Rather than a localized perched condition as HydroFocus concludes without presentation of adequate data[31], the four wells collectively support instead a laterally extensive (of a few miles at least) saturated unit possibly above the Dune Sand/A Aquifer unit. It is possible that an additional aquifer above or within the Dune Sand/A Aquifer unit is present south of the Salinas River and is not the seemingly insignificant localized perched zone HydroFocus concludes. Additional data should have been collected to determine if this apparent upper aquifer unit is in hydrologic connection to the Dune Sand/A Aquifer unit. If it is, the evident vertical gradient warranted better vertical resolution (increased layering). This, among other expanses of model layer2 where the absence of water level data could not allow for similar revelation, may be an indication that the layering is too coarse for accurate representation of the uppermost aquifer units, including the Dune Sand/A Aquifer unit, thereby preventing evaluation of the full impacts from slant well pumping. Because the consultants provided no interpretation of the potentiometric surface, or the model-simulated potentiometric surface for any aquifer in their reports, contrary to model reporting standards, the extent to which this area may be in hydrologic communication with the Dune Sand unit at CEMEX has not been investigated

[28] MW-OU2-07-A, MW-BW-31-A, MW-OU2-29-A and MW-BW-01-A

[29] MW-OU2-07-A hydrograph Figure 4.1a shows an approximate 90% increase in the error between the beginning and end of the correlated portion of the record. MW-BW-31-A observed values show an anomalous step in the record which prevents a determination of the change in errors before the simulation period ends in Sept 2011.

[30] Errors in starting head and errors in the boundary conditions represent different error impacts in the model.

[31] Review of lithologic logs and interpretation of the potentiometric surface would have helped to distinguish whether the area may be in hydrologic communication with the aquifer or is perched, but Geoscience excluded the water level data, and HydroFocus concluded, in my opinion without adequate analysis completed, that the area was likely perched and that Modflow limitations prevented accurate representation of the water levels. Both consultants failed to adequately characterize this area, among others in NMGWM as a consequence of not collecting additional data in the uppermost unit.

or described by the consultants. The model does not allow for this communication as evidenced in the calibration results.

The extremely low Kv applied to the Dune Sand/A Aquifer unit, and particularly in the underlying layer 3[32] appears to have resulted in eventually reducing the residual at three of the wells. The extremely low Kv was applied to reduce the residuals at the wells, but because the value seems unreasonable, its use as a mechanism (prop up the head in layer 2) to improve the appearance of the calibration, instead reduces the confidence in the calibration.

Geoscience included no data for calibration of this unit. Because of the errors revealed in the HydroFocus calibration and report, the Geoscience calibration is expectedly also poor, as likely would have been concluded had the data been included.

For the CEMEX modeling as presented in Figure 4.2, the comparison between the observed and model-calculated values indicates low error in the water level residuals. However, the basis provided by HydroFocus on its improvement to well MS-5S[33] consists of the changes made to the SVA Kv. The Kv changes are described above and are considered unreasonable but applied as a mechanism to prop up the head in the model. An acceptable calibration achieves low magnitude, spatially and temporally random error, using reasonable parameter values. Because a sensitivity analysis of the calibrated parameter values was not presented in the report, the influence of the low Kv on the CEMEX area model-calculated water levels is unknown. The extent to which the model water level distribution in the Dune Sand/A-Aquifer unit in the CEMEX area depends on the seemingly unreasonable low Kv value of the nearby underlying SVA has not been assessed due to the consultants not including a sensitivity analysis of the calibrated parameter values.

The calibration is poor for the Dune Sand/A Aquifer unit and is affected to an unquantified extent by erroneous boundary conditions, erroneous starting heads, unreasonable parameter values and insufficient data. Based on the reports, the interpretation is also insufficient and fails to characterize the impact of these errors on the accuracy of the calibrated parameter values. Model predictions relying on a model with these errors are unreliable.

180-ft Aquifer

[32] as described in Section 3.2.1

[33] The CEMEX test was simulated in the Geoscience and HydroFocus NMGWM, but MW-5S available for monitoring and calibration during the slant well testing was excluded from Figure 4.6 without explanation.

The HydroFocus calibration included 10 wells with time-series data. The match between the observed and calibrated water levels at six of the wells is excellent in both timing and magnitude. However, five of the six wells are proximal to rivers (streams slough, etc; unlabeled in the HydroFocus report). It cannot be concluded that aquifer property values are accurate because the good fit between observed and calculated values may be a consequence of the unreported streamflow infiltration values provided by SVIGSM. It is not even clear from the reports if streamflow infiltration is applied in layer 3. Furthermore, because a sensitivity analysis was not presented for the calibrated parameter values, the sensitivity of these observations to recharge is unknown.

Two of the model-calculated water level hydrographs exhibit too much variability in the model response as compared to the observed response, and the remaining two show too little variability in the magnitude as compared to the observed values. But the extent to which this is significant depends on the problematic LSCE treatment of pumping in its calibration as described in Section 2.2 of this report. The LSCE calibration included allocation of pumping rates vertically across the aquifers based on observed water level data; water level data also used in the subsequent Geoscience and HydroFocus calibrations.[34] The LSCE practice resulted in what may be considered a contamination of the independence of the water level dataset because of the explicit correlation made between water levels and pumping in SVIGSM. If the pumping is inaccurate (as concluded by HydroFocus and this review), but a reasonable fit between observed and calculated water levels has been achieved due to parameter (K,S) adjustment, as is shown to be the case to an extent in the consultants respective calibrations, then the aquifer properties are likely inaccurate also. Use of the observed water levels to allocate pumping results in lower confidence in the aquifer parameter values.

The calibration results indicating low error are not an indication that the underlying parameter values are reasonable, only that they have compensated for unquantified error in pumping, recharge, boundary conditions and initial heads. The extremely low Kv values are a demonstration of exactly this. The confidence in the calibrated model is low, and reliable predictions of drawdown cannot be calculated.

Geoscience presented only four hydrographs for the 180-ft aquifer, and nine for the 400-ft aquifer, even though the 180-ft aquifer is of prime interest, and more data was available. LSCE presented seven hydrographs for the 180-ft aquifer. HydroFocus presented 10 hydrographs. Why the available data was excluded was not addressed in

[34] Approximately the same datasets, as Geoscience only presented four of the wells in its report with its appended LSCE report showing only seven as compared to HydroFocus presenting 10 hydrographs.

the Geoscience report. The Geoscience 180-ft aquifer residuals range from low magnitude to as high as approximately 18 ft. The two remaining wells show an acceptable match to observations, but this statement is qualified in the preceding paragraphs. Even where low residuals have been calculated, there is low confidence in the calibrated aquifer parameters.

The CEMEX modeling based on the Geoscience and HydroFocus calibrated models, shows low magnitude error but a bias in the model-calculated water levels indicating that the model cannot reproduce the variability exhibited in the observed values. HydroFocus did not provide an explanation for this effect.[35]

Another anomaly in the HydroFocus and Geoscience calibrations was the ambiguous placement of observation well 14S/2E-14L01 which according to the Monterey County Water Resources Agency is a 180-ft aquifer monitoring well. But because of seemingly similar water levels, was instead placed in the 400-ft aquifer layer. Sufficient information was not presented to discern that the consultants assigned the well to the correct aquifer. The well construction details were apparently not reviewed although that review may have resolved the ambiguous placement with more confidence. HydroFocus did not identify that Geoscience undertook this effort either.[36]

400-ft Aquifer

The HydroFocus model generally underestimates the observed response in this aquifer, and generally simulates too high a head compared to the observations. The Geoscience model achieved a poor calibration over most of the 400-ft aquifer with the largest residuals calculated along the eastern and northern boundaries. Residuals of greater than 50 ft are prevalent in proximity to the eastern boundary. This result shows that the eastern boundary water levels were significantly erroneous and influenced the water level distribution inside the model, including expectedly, the predictions of drawdown made by Geoscience from slant well pumping. No observations near the southern boundary were included so the extent to which the southern boundary water levels were erroneous cannot be determined.

For the CEMEX modeling as presented in Figure 4.2, evident bias is shown for the 400-ft aquifer with all simulated water levels higher than the corresponding observed values. This indicates that the model underestimated the impact to the 400-ft aquifer during

[35] Although the report does identify that pumping and recharge changed after September 2011, but also identified that hydrologic conditions have not likely changed substantially between the model timeframe and the water level data period.

[36] Geoscience prepared a communication for HydroFocus on the matter but I have not reviewed that document.

CEMEX pumping from the overlying aquifers. It is not evident from the report, if the calibration sought to resolve this. If not, the predicted impact to this aquifer will be underestimated for the MPWSP.

900-ft Aquifer

During half of the simulated period, the observed water level response at all of the monitoring wells varies over a narrow range of approximately two feet. The model simulates a 10-ft range.

3.5 Analysis of the Model Error

Insufficient data was used for model calibration as described. The error evaluated by the consultants only reflects as much error as the calibration dataset allows, which is limited most notably in the Dune Sand/A Aquifer unit, a primary aquifer targeted for slant well pumping, as well as by the absence of stream gain-loss data. Error along model boundaries is largely unquantified owing to limited data in those areas. The impact of this error on calculated water levels across the model is unquantified. Because sensitivity analysis of the calibrated values and parameter uncertainty analysis were not performed, the model error has not been thoroughly evaluated for calibration or prediction.

The structural error due to elements including layering and zonation has not been evaluated. It is possible that an additional aquifer above or within the Dune Sand/A Aquifer unit is present south of the Salinas River and is not the (insignificant) localized perched zone HydroFocus concludes. This, among other expanses of model layer2 where the absence of water level data could not allow for similar revelation, may be an indication that the layering is too coarse for accurate representation of the upper aquifer unit, thereby preventing evaluation of the full impacts from slant well pumping.

But model error in the form of bias is evident in the calibration results. Model error is reflected in the non-randomness of the residuals as demonstrated by the correlation between residual error and calculated water levels, and non-randomness in space, and to the extent it could be determined, unreasonable parameter values.[37] Sensitivity analysis of calibrated parameter values, and of the SVIGSM-adopted errors in pumping and recharge was not accomplished. Without this, the uncertainty in the parameter values is unknown.

[37] Because specific values of K and S from aquifer testing were not reported, the extent to which the model values adhered to reasonable values as determined independently of the model cannot be determined. In some cases however, the calibrated values do not appear to be reasonable based on other indicators.

Rather than rectify the model bias error, HydroFocus employed superposition to predict the drawdown associated with proposed slant well pumping. But the model error, the revelation of which was limited by the dataset, was inherent in the calibration, and superposition relied on the calibrated parameter values. So the error was transferred and potentially compounded for the superposition modeling.

Geoscience and HydroFocus present other error measures in their respective reports including the relative error, concluded by HydroFocus to be acceptable based on the following excerpt (pg. E-1):

> The relative error calculated from the standard deviation of the model errors and range of measured water levels in the model meets calibration criteria and ensures that model errors are only a small part of the overall model response.
>
> The results provide confidence that the model calculations are reliable estimates of the groundwater response to pumping, which was confirmed by simulating measured drawdown during test slant well pumping.

The statements are ambiguous, but importantly, HydroFocus correctly concludes that other model measures, including the identified bias, renders the calibrated head model unacceptable for use in predictions of drawdown from slant well pumping. This set of conclusions, that the residual error is low, but the model bias is significant and the calibrated model cannot accomplish what it was designed for, is a good demonstration that an acceptable calibration must consider bias as an integral measure of model utility. Geoscience did not include sufficient data or analysis to make the correct conclusion that HydroFocus was able to make. The model was not calibrated to an acceptable standard, but instead of improving the calibration, admittedly not a simple undertaking in this case, HydroFocus employed superposition for predictive modeling.

4.0 Predictive Modeling

4.1 Uncertainty in Calibrated Parameter Values

HydroFocus and Geoscience did not evaluate the uncertainty in the calibrated parameter estimates, and its impact on the calculated water levels. HydroFocus evaluated only the sensitivity of a few parameters near CEMEX and Potrero Road sites during predictive modeling. From its limited sensitivity analysis for predictions, HydroFocus concluded (pg. 42):

> Increasing the anisotropy (increasing horizontal conductivity and decreasing vertical conductivity) minimizes the area of the cone of depression. Conversely, decreasing the anisotropy (decreasing horizontal conductivity and increasing vertical conductivity) maximizes the area of the cone of depression.".[38]

Hydraulic conductivity often exhibits characteristic anisotropy, meaning that it is directionally dependent[39] and in the NMGWM, anisotropy is used to reflect that Kh is not equal to Kv.[40] The HydroFocus conclusion stated above regarding the effect of anisotropy on the drawdown cone extent is counterintuitive to the expected result. For clarification, higher anisotropy indicates that the Kh is *much* larger than the Kv. For such a situation, among other variables[41], one would expect a laterally extensive drawdown in the horizontal direction (high Kh) and limited drawdown vertically (low Kv). The conclusion HydroFocus derived based on its modeling does not make sense.[42] Reducing the anisotropy (making Kh and Kv less dissimilar, or more equivalent in magnitude), and allowing for increased vertical flow should result in a cone of depression that is less laterally extensive. The HydroFocus model calibration included apparently unreasonable values of Kh and Kv east and south of the CEMEX site, and the remainder of the model includes parameter values of unquantified uncertainty because of inadequate sensitivity analysis.

HydroFocus presented three scenarios varying the pumping allocation between the Dune Sand/A Aquifer unit and the 180-ft aquifer. However, HydroFocus elects to present results for the scenario which is apparently not based on the most likely allocation between the two aquifers. Based on the CEMEX model calibration, more of the pumping is derived from the Dune Sand as opposed to the 180-ft aquifer (worse-case scenario?). While it is unclear why HydroFocus presented the results of this apparently less likely scenario, it may be that increased pumping from Dune Sand would have calculated a greater drawdown extent and increased leakage from the Salinas River and other modeled surface water drainages.[43]

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[38] Pg 42 in HydroFocus report

[39] Anisotropy is defined as a property that varies with direction (Driscoll, FG 1986. Groundwater and Wells. Johnson Filtration Systems, Inc.)

[40] Kh can also be directionally dependent along the x and y tensors. But NMGWM does not reflect this particular anisotropy.

[41] Storage characteristics, transmissivity values, well completion, initial head and head differences across layers, boundary effects, etc.

[42] Because I do not have access to the model files, I cannot confirm that this is accurate. It is possible that sufficient numerical precision was not achieved, or the flow budget was associated with excess error. Or it is possible that the statement is correct but not intuitive.

[43] However, this can only be surmised without access to the model files.

HydroFocus adapted the NMGWM superposition model to include explicit representation of a portion of the Salinas River and Tembladero Slough/Reclamation Ditch using the Modflow river package so that the stream-aquifer interaction along these drainages is represented in order to quantify the impacts from slant well pumping. A large reach of the Salinas River and several other streams are not included in the analysis. No explanation for this is provided.

Because the calibration does not incorporate evaluation of stream gain-loss data, and the conceptual model does not include adequate information or analysis of the stream-aquifer interaction, the superposition model-predicted depletion impacts to the surface water system are concluded to be unreliable. The uncertain MPSWP predicted impacts to the streams may exceed allowable limits of established minimum streamflow standards. The results did not address this possibility.

4.2 Superposition

HydroFocus abandoned use of the calibrated head model, and instead relied on superposition to quantify the drawdown impacts from slant well pumping. But superposition relied on a set of calibrated parameter values which are concluded to also range from unreasonable to exhibiting significant but unquantified uncertainty. As a consequence, the superposition modeling produced unreliable predictions of drawdown from slant well pumping.

Superposition requires that the model be linear[44], or nearly so. But the degree of potential nonlinearity was not investigated by HydroFocus. It is not concluded that the thinning and unconfined Dune Sand/A Aquifer, or the reduction in transmissivity from slant well pumping or the boundary conditions did not present significant nonlinearities in the system causing the application of superposition to calculate erroneous drawdown values. This same criticism may be applicable to the Salinas Valley Aquitard where it may become unconfined during predictive simulations.

Superposition, as applied in the HydroFocus work, did not include dynamic updating of the boundaries which may have incurred drawdown, although the presentation style of reporting only drawdown greater than one foot does not show the full drawdown extent.[45] The zero/near zero drawdown contour should have been included in the Geoscience and HydroFocus analyses and figures to identify areas where the boundaries affected the model-calculated drawdown extent. The boundary inflow with and without

[44] Reilly TE, OL Franke, and GD Bennett, 1984. The Principle of Superposition and its Application in Ground-Water Hydraulics, U. S. Geological Survey Open-File Report 84-459.
[45] This was the presentation form in both the Geoscience and HydroFocus reports.

slant well pumping should have been presented to discern any changes in inflow mitigating drawdown. A prevailing gradient is simulated at the General Head Boundary (GHB). If pumping inside the model results in drawdown reaching the GHB, inflow at the boundary will continue at a biased high rate resulting in an erroneous calculation of the drawdown extent. Insufficient analysis and reporting does not demonstrate that this was not a factor.

Application of superposition to isolate the impact from only the slant well pumping may be inconsistent with the model purpose as defined by Geoscience (pg. 8):

> The purpose of this study was to evaluate the impacts of the proposed MPWSP on the Salinas Valley Groundwater Basin. Groundwater modeling was conducted to assess the impacts of MPWSP on the groundwater levels and the seawater intrusion.

The Salinas Groundwater Basin includes multiple complex variables (recharge and discharge) changing in time and space which affect the groundwater levels and rate and extent of seawater intrusion. The success of the slant well pumping to expectedly not exceed seawater intrusion thresholds, among other measures, is dependent on the effects from these other complex and dynamic stresses. In the superposition analysis, these other relevant stresses are omitted, thereby making system response predictions unreliable. It is insufficient to predict only slant well pumping impacts in a dynamic system integrally defined by many other complex impacts which in turn, affect the slant well pumping.

The application of superposition, intended by HydroFocus to diminish the error and uncertainty in many aspects of the calibrated head model, did not alleviate the errors or quantitatively demonstrate a reduction in error, and possibly introduced new and different errors in that aspects of the superposition model were not calibrated (i.e. stream gain-loss; boundary inflow, etc.).

4.3 Slant Wells Designed to Replace Freshwater with Saltwater

Dr. Weitzman indicated that according to his understanding of the project objective, that the slant wells would not cause additional seawater intrusion and requested that if available, I include information from the consultants reports which did not support this understanding.

Review of the consultants reports identifies that seawater intrusion would increase. The increase in inland extent due to creation of a cone of depression from pumping was not reliably determined in the consultants model. But the slant well pumping is designed to replace freshwater in the Dune Sand/A Aquifer unit and 180-ft aquifer with seawater

over some unreliably quantified aquifer volume and timeframe based on the HydroFocus report excerpt presented below (pg. 36):

> A capture zone refers to the three-dimensional volume of aquifer that contributes the water extracted by the wells. When the pumps are turned on, the wells initially extract the existing ambient mix of native groundwater in storage, but as pumping continues the wells extract increasing proportions of infiltrating recharge from the ocean. The ocean recharge gradually replaces the ambient water within the capture zone, and moves within the capture zone toward the well but does not spread beyond the capture zone. In map view, the capture zone is a 2-dimensional surface that delineates the underlying aquifer volume where ocean water replaces ambient groundwater and ultimately becomes the primary water source to the wells.

Because the slant well pumping is designed to replace aquifer freshwater with seawater, the pumping necessarily results in an increase in seawater intrusion into aquifer areas still containing freshwater.

5.0 Conclusions

The MPWSP proposes slant well pumping to replace freshwater aquifers with seawater as a supply for the desalination plant. A calibrated model was needed to make accurate predictions of drawdown and seawater intrusion resulting from slant well pumping. To accomplish this, the existing SVIGSM model was updated. The model results were adapted for use in the better resolution NMGWM. Geoscience calibrated the NMGWM as described in its 2015 report. HydroFocus provided an alternate calibration starting with the Geoscience model as described in its 2016 report, and used superposition for its predictions of drawdown.

Based on my review of the reports, it is concluded that:

- Insufficient data was collected/evaluated for the model calibrations:
    - including, but not limited to, inadequate (to no) water level data in particular for the Dune Sand/A Aquifer unit, one of two primary units targeted for slant well pumping,
    - and stream gain-loss data which would have improved the model and aided in parameter optimization.

- SVIGSM produced unreliable estimates of the pumping, recharge and initial water levels for use in NMGWM.

- NMGWM calibration included adjustment of model parameters based on unreliable values from SVIGSM.
- Geoscience was aware of Dune Sand/A Aquifer unit data but excluded it from the calibration without explanation. Geoscience also excluded water level data available for the 180-ft aquifer, also without explanation.
- Inadequate information was presented in the reports contrary to standard model report documentation and included:
    - Interpretations of the potentiometric surface for each aquifer in the NMGWM area were not included in the reports.[46] Recall that the potentiometric surface is described by a series of contour lines along which the potential head is equal. The ground water flow direction is perpendicular to the contours. Standard model reporting includes representation of the interpreted and model-simulated surfaces to show that the model is consistent with the hydrogeologic understanding of head and flow directions derived from the conceptual model. No such demonstration was made in either consultant's report for the NMGWM area.
    - Simulated potentiometric surface maps from the NMGWM area were not presented in the consultants' reports.
        - It is possible that an additional aquifer above or within the Dune Sand/A Aquifer unit is present south of the Salinas River and is not the (insignificant) localized perched zone HydroFocus concluded. This, among other expanses of model layer2 where the absence of water level data could not allow for similar revelation, may be an indication that the layering is too coarse for accurate representation of the uppermost aquifer units, including the Dune Sand/A Aquifer unit, thereby preventing evaluation of the full impacts from slant well pumping. Because the consultants provided no interpretation of the potentiometric surface, or the model-simulated potentiometric surface for any aquifer in their reports, contrary to model reporting standards, the extent to which this area may be in hydrologic communication with the Dune Sand unit at CEMEX, for example, has not been adequately investigated or described by the consultants. The model does not allow for this communication as evidenced in the calibration results.

[46] although the Geoscience model report did append the LSCE interpretations and simulations from SVIGSM of the 180-ft and 400-ft aquifers

- Inadequate specific information was reported for the source data including K and S values that were relied upon for parameter adjustment.
- Inadequate explanation was provided for the recharge distribution, including the characteristics associated with streamflow infiltration rates along unnamed rivers in NMGWM.
- HydroFocus did not report the K and S values estimated from the CEMEX testing and, without explanation, did not rely on those for calibration of NMGWM (Figure 3.3d).
- The Geoscience model report did not include an interpreted model water budget or a simulated water budget. HydroFocus presented a simulated budget but it is concluded to be incorrect for many reasons described in this report.
- A comparison between the SVIGSM aquifer properties and model calculated heads upon which NMGWM relied was not presented in the Geoscience model report. Evaluation of evident model bias was not included in the report, and therefore could not be used to improve the model. Because of this, erroneous initial heads and erroneous heads along the boundaries were not revealed until the HydroFocus report, which included data for the Dune Sand/A Aquifer unit and additional data in the 180-ft aquifer. The Geoscience model was considered a poorly calibrated model despite the calibration results presented which showed a low error in the residuals.
- The HydroFocus report revealed the existence of unacceptable error from model pumping, model recharge, initial model heads, and model boundary heads, but failed to provide detailed information to support its conclusions. Instead of correcting these errors (probably a major undertaking), HydroFocus subsequently relied on superposition for prediction of drawdown impacts from slant well pumping so that some of the identified error was eliminated to improve accuracy in the predictions.
- HydroFocus simulated stream-aquifer interaction with the Modflow river package but did not provide an explanation why some NMGWM area streams/rivers were excluded from the predictive analysis.
- HydroFocus did not present a comparison of model-calculated gain-loss estimates against estimated values and therefore did not demonstrate that their assumptions and assigned properties were accurate.

- It was indeterminate whether the model calibration was accomplished using inverse methods, considered an industry standard at this time[47], or was accomplished deterministically. At a minimum, an explanation for not using inverse techniques should have been included in the report.
- HydroFocus and Geoscience did not include the NMGWM calibrated parameter sensitivity and parameter uncertainty. Sensitivity analysis is considered an industry standard. If inverse modeling was done, enormous information generated by that process was excluded from the reports, including among other output:
  - Sensitivity of parameters
  - Sensitivity of water level observations
  - Sensitivity of boundaries
  - Parameter correlation
  - Parameter confidence intervals
  - Degree of nonlinearity

- Because of inadequate data, analysis, reporting and the use of parameter values ranging from unreasonable to unquantified uncertainty, and known and unknown error, the NMGWM is concluded to be poorly calibrated and not representative of the aquifer system.
- HydroFocus, in recognition of some of these elements, rejected use of the NMGWM head model and instead used superposition based on NMGWM calibrated parameter values to predict drawdown from slant well pumping.
- Because superposition relies on parameters from a poorly calibrated model with known and unknown/unquantified errors, the error in the parameter estimates contributes unquantified error to the predictions.
- Superposition did not produce reliable estimates of drawdown from slant well pumping, and is not concluded to have been the appropriate methodology to employ to meet the Project goals.

[47] My opinion stating that inverse modeling is the industry standard for approximately 15 years now is based on the techniques in model calibration presented at the Colorado School of Mines Integrated Ground Water Modeling Center's biannual conference (over the past 20 years) with inverse modeling being the most common approach among modelers presenting at the conference. Also at least three public domain codes are available for use. All models are not necessarily amenable to inverse modeling if dry cells are calculated but because NMGWM did not incur this effect according to the absence of information in the reports, it should have been calibrated using this standard technique.

Luster, Tom@Coastal

From: Ethan Meyer <ethan.meyer@gmail.com>
Sent: Tuesday, September 08, 2020 10:34 AM
To: CalAmMonterey@coastal
Subject: Opposition to CalAm Desal Project in Marina

Hello,
As a long-time resident of the city of Marina, I am opposed to CalAm's proposed Desal Project in Marina. I am concerned about the potential environmental impacts to our coastline, and the potential environmental and health impacts to Marina's existing water supply. Other more environmentally and economically sound options exist, like the Pure Water Monterey Project. Smarter solutions exist. Please do not approve the permit by CalAm.

Thank you,
Ethan Meyer

Luster, Tom@Coastal

From: A&N Kukulan <kukulan94611@gmail.com>
Sent: Monday, September 07, 2020 11:10 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

Dear Commissioners,

My wife wrote a letter signing both of our names but I wanted to write my own letter

I am writing in support of your staff's recommendations OPPOSING California American Water Company's (Cal-Am) proposed Monterey Peninsula Water Supply Project. Some of the reasons important to me are the project's extremely high costs and its environmental impacts. In addition, there is a project available, the expansion of the Pure Water Monterey project, that would satisfy Cal-Am's need for additional water supply.

Cal Am has failed to produce a good solution in a long time and have used deceptive practices in their mailing. Please help protect our dunes and marine life with a more environmentally

sustainable program with the Pure Water Monterey project.

Thank you,

Nicholas Kukulan

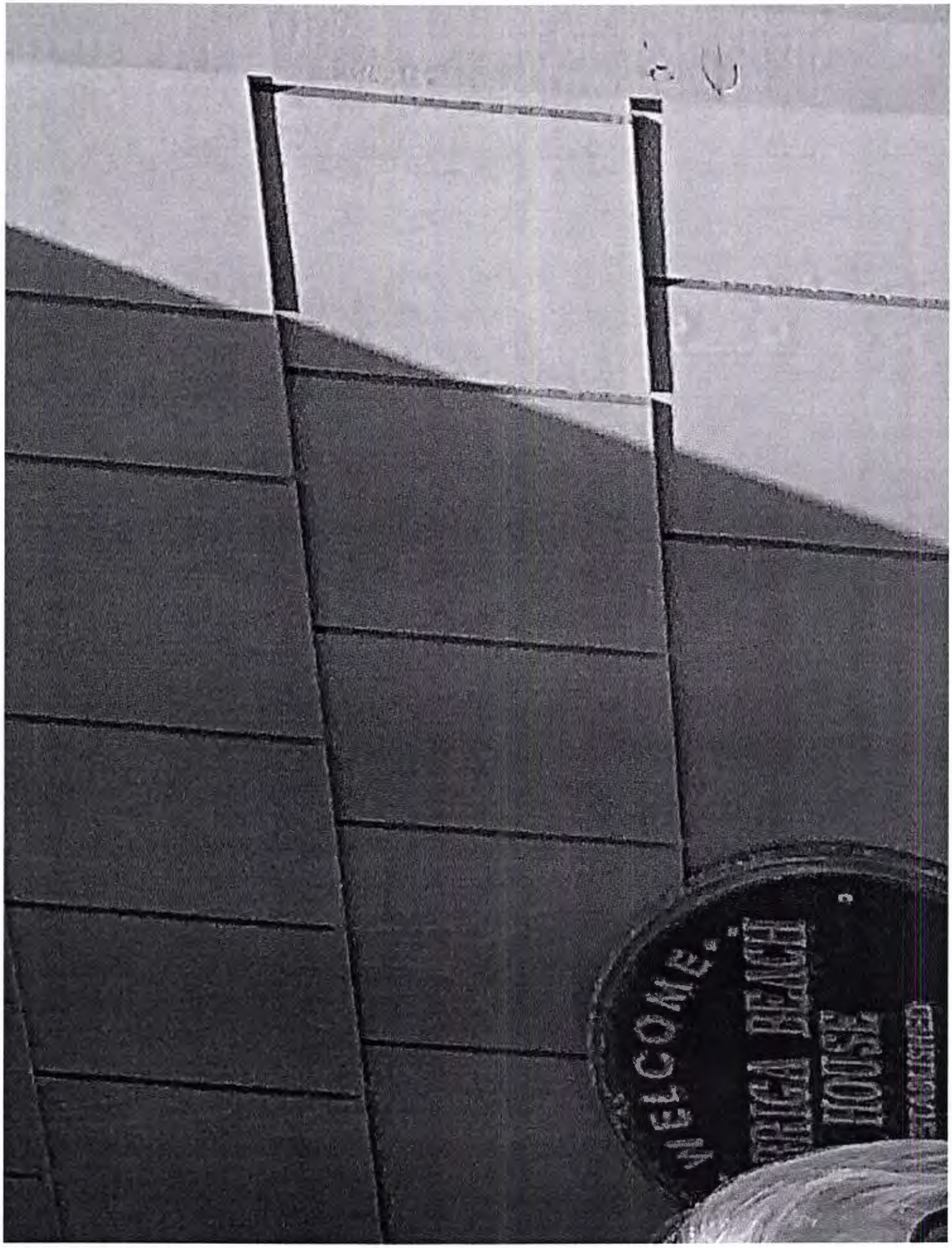
Carmel Highlands

Luster, Tom@Coastal

From: Debi Nobriga <nobrigadj@yahoo.com>
Sent: Monday, September 07, 2020 10:41 PM
To: CalAmMonterey@coastal
Subject: Fw: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff.


WELCOME
HOUSE

My name is Debi Nobriga and I have lived in Marina for 4 yrs. I have raised a family of 6 boys (now men) and am now retired. I chose Marina for the proximity to its beautiful dunes and its wonderful community. This community faces many challenges, the most important being the safety of its aquifers, which is its sole source of water supply. CalAm's proposed desalination plant is a blatant **exploitation of a disadvantaged community**.
Marina will NOT benefit from this plant, as we are not CalAm customers, but .....
It will adversely impact Marina's water source, AND adversely impact the habitat (dunes) of the Snowy Plover.

The Pure Water Monterey expansion project is completely doable with no environmental impact. It will produce the water needed without the slant wells and it's adverse impacts.

Please deny CalAm's application for this permit for the Slant Well project!

Respectfully,

Debi Nobriga
The Dunes of Monterey Resident
nobrigadj@yahoo.com

Luster, Tom@Coastal

From: Judy Strojny <judystrojny@hotmail.com>
Sent: Monday, September 07, 2020 9:34 PM
To: CalAmMonterey@coastal
Subject: Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and Staff:

2020 began with great promise as a year of "clear vision". Bill and I were looking forward to soaking up the sounds, smells and visual pleasures of living near the beaches in Marina. Although we still enjoy the pleasure of this relaxing environment, this year has dealt our community a heavy blow as we deal with the many Corona virus concerns. Our community certainly needs a relief from additional stress. Damaging our environment and destroying our wildlife is unthinkable.

Please support our committee's well being by denying the CalAm Slant Well project.

Sincerely,
Judy Strojny

Luster, Tom@Coastal

From: a&n Kukulan <kukulan94611@gmail.com>
Sent: Monday, September 07, 2020 7:15 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

Thank you very much for all the work done

I'm writing to strongly urge you to vote AGAINST CalAms Desal Project

Pure Water Monterey Expansion is the feasible and environmentally preferable alternative There is no water supply crisis. Pure Water Monterey will give us a new water supply much sooner than desal

Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021. The environmental issues facing the Carmel River have been resolved without Cal Am's desal.

Expansion of Pure Water Monterey provides a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and protecting the Carmel River and the Seaside basin.

Cal Am's Desal project is not in the public interest Cal Am's desal would double our water bills. We don't need Cal Am's oversized, over priced desal project to provide our future water supply Cal Am is the only obstacle to the expansion of Pure Water Monterey. Also Cal Ams recent mailer is deceptive and and seems to want to confuse the voters by trying to get users to sign up for pure water by clicking on their link. Cal Am cannot be trusted. Passing Measure J was the community's statement

I believe that Desal damages the environment, costs too much and creates environmental injustice. It (Desal) harms the coastal habitat and Marina's beautiful dunes
Desal would draw from an overdrafted groundwater basin NOT under the ocean

PWMon the other hand Would source water from primarily the 8,000 acre-feet of excess wastewater that is now discharged into the Bay. It is contractually secure and drought proof
Pure Water It is the same system thatOrange County has used for decades

Cal Am has had 25 years to solve or water supply problem with too much delay and litigations.

Thank you
Nick and A Kukulan
Carmel Highlands

Luster, Tom@Coastal

From: R. J. Roland <President@rolands.com>
Sent: Monday, September 07, 2020 5:51 PM
To: CalAmMonterey@coastal
Subject: Please DENY CAL AM's Desalination Project

Members of the California Coastal Commission,

I know you have all heard this before. I am a member of the citizen's group that has been advocating for public ownership of the Monterey water system for years. Forgive me if I become repetitive but this is very important to me and my children. Please deny CAL AM's arguments against public ownership because:

Cal Am's desalination project is not in the public interest. They have had 25 years to solve or water supply problem.
Currently, Cal Am is the only obstacle to the expansion of Pure Water Monterey (PWM).
Pure Water Monterey Expansion is the feasible and environmentally preferable alternative. It will give us a new water supply much sooner than any desalination effort. The current water supply from PWM – Phase 1 (3,500 acre-feet), will allow Cal Am to stop illegal withdrawals from the Carmel River by December 2021.

The environmental issues facing the Carmel River have been resolved by PWM without the need for Cal Am's desalination or the PWM Expansion. Our current water supply will restore the Carmel River and protect the Steelhead. Cal Am desalination project is a solution to a problem that does not exist!

Affordable housing cannot be planned without affordable water yet the Cal Am desalination project would substantially increase our current water bills. The Expansion of PWM will provide a long-term sustainable water supply for decades of growth. It will support affordable housing and economic recovery and avoid environmental damage and environmental injustice to Marina.

The passage of Measure J affirmed the community's statement to the feasibility study to purchase the Cal Am assets. Moving forward to meet that vote is the PUC's responsibility. Please help us out.

V/r,

Jay Roland

Ronald J. Roland, Ph.D., President
ROLANDS & ASSOCIATES Corporation
120 Del Rey Gardens Drive
Del Rey Oaks, CA 93940

+1.831.373.2025; +1.888.FOR.JTLS
M:+1.831.402.8607
www.ROLANDS.com

Luster, Tom@Coastal

From: Ronald Shikashio <ronaldshikashio@yahoo.com>
Sent: Monday, September 07, 2020 5:23 PM
To: CalAmMonterey@coastal
Subject: CalAm Desal Project

As a concerned Marina resident I am opposed to the CalAm Desal Project. My main opposition to this proposal is my concern that this project could deplete or contaminate our city's groundwater. I don't want to be subjected to water contamination problems such as suffered by Flint, MI..

Regards,

Ronald Shikashio
301 Sirena Del Mar Rd.
Marina, CA. 93933

Luster, Tom@Coastal

From: Andrew Zendejas <21097@gopalma.org>
Sent: Monday, September 07, 2020 4:29 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

To: CalAmMonterey@coastal.ca.gov
From: 21097@gopalma.org (Andrew Zendejas)
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Andrew Zendejas; I am a resident of Gonzales, California. In my family I have two sisters, one brother, and two wonderful parents. We enjoy our quiet life in our small hometown with our dog, Cookie, who I received as a gift for my tenth birthday. I am a current high school senior at Palma High School meanwhile my younger sister attends our sister school, Notre Dame. My older siblings have attended or are currently attending the University of California Santa Cruz in preparation for medical school. My parents are hardworking individuals who work in the agriculture and custodial business to pay for our schooling. We may not live in the area but we are worried that the CalAm project will negatively affect the city of Marina therefore negatively impacting the people who live there. The city of Marina is a highly populated BIPOC area, which makes the project not only an economic issue, but a social issue. The project under review is similar to the stories of gentrification in which white owned businesses attempt to obtain property owned by BIPOC to accommodate to the needs of middle to upper class people who also happen to be majority white. Please do not let CalAm capitalize off of what belongs to the citizens of Marina, which again is a majority BIPOC area. Additionally, I am enrolled in an AP Environmental Science class that has highlighted this topic as a prominent local issue concerning our Earth's most precious resource. We have already discussed how limited access to uncontaminated freshwater will become if we, as human beings, continue to take easy cash grabs that neglect what is best for the environment only to fill people's pockets. I believe that the CalAm initiative is one of these cash grabs that will push California and the world as a whole into an unhealthy position in the future. Please ask yourself if a greedy short-sighted plan is worth negatively impacting the environment and community of Marina. Please deny this harmful project! Thank you.
Sincerely,
Andrew Zendejas

Luster, Tom@Coastal

From: Mitch Johnson <aikimich@gmail.com>
Sent: Monday, September 07, 2020 4:01 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff,

My name is Mitch Johnson. I have been a resident of the Marina for about 50 years. My wife, Trish was born in Monterey and has lived and worked here all her life. When we decided to buy a home, Marina was the obvious choice. It is a beautiful place, and we love it.

I'm writing today to ask you to please deny CalAm's permit for their proposed desal project. Better technology already exists that is more ecologically sound, much (much) less expensive, and will provide all the needed water – and more - where it is needed. This technology will continue to advance and will only get better, supplying all the water that the Peninsula needs, eventually in quantities that will allow us to replenish sources that have been overdrawn.

The proposed desal plant will be an environmental disaster. Please deny this harmful project.

Thank you,

Mitch Johnson

Marina, CA

Luster, Tom@Coastal

From: Douglas Holtzman <dholtzman@mac.com>
Sent: Monday, September 07, 2020 2:12 PM
To: CalAmMonterey@coastal
Cc: Jennifer Smith
Subject: Public Comment on September 2020 Agenda Item undefined 3a - Appeal No. A-3-MRA-19-0034 (California American Water Company, et. al., Monterey Co.)

Dear CA Coastal Commissioners, Executive Director John Ainsworth, and staff:

We have lived in Marina for 16 years. We value many things about our community, including its economic and cultural diversity, its beautiful protected beaches, and its affordable public water supply.

We support your staff recommendation to deny the CalAm Slant Well project. The project threatens our groundwater and our dunes. The Pure Water Monterey Expansion Project is a lower-cost, environmentally responsible alternative.

Please deny this harmful project!

Thank you.

Douglas Holtzman
Jennifer Smith

****

Douglas Holtzman
dholtzman@mac.com

Luster, Tom@Coastal

From: Douglas McLain <dmclain@hotmail.com>
Sent: Monday, September 07, 2020 1:36 PM
To: CalAmMonterey@coastal
Subject: Deny CalAm Desal Project

Salt and water are ionic substances and separating them is energy expensive; proportional to the salinity of the water. Sea water is 3.5 percent salt while domestic and agricultural waste waters are less than 1.0 percent salt. Thus desalting waste waters is much less expensive than desalting sea water. Pure Water Monterey will recycle low salinity waste and brackish waters, thus saving energy costs.

The proposed CalAm desalination system would use electricity generated by the gas-fueled generator at Moss Landing. We should reduce our burning of fossil fuels wherever possible to moderate climate effects.

Desalination of sea water discharges high salinity brine into the ocean which may harm marine life.

For these reasons, I urge you to deny CalAm's proposed seawater desalination program.

Douglas R McLain
PhD Oceanography, University of Michigan
651 Sinex Ave, K216
Pacific Grove, CA 93950

Sent from my iPad

Sent from my iPad

Luster, Tom@Coastal

From: Joseph Lucido <joseph.lucido@sbcglobal.net>
Sent: Monday, September 07, 2020 1:15 PM
To: CalAmMonterey@coastal
Subject: Subject: Cal Am's Desalination Project/Staff Report on De Novo Appeal and Consolidated Coastal Development Permit
Attachments: Commission Letter.docx

California Coastal Commission

With respect to Coastal Commission Staff Report on De Novo Appeal and Consolidated Coastal Development Permit,

I submit this attached letter for your consideration.

I have read the California Coastal Commission staff's Summary of Staff Recommendation. I agree with your staff's findings that the Cal Am proposed Monterey Peninsula Water Supply Project (MPWSP) is inconsistent with relevant Coastal Act and LPC policies and that the Commission may not approve the Project despite those inconsistencies because the PWM Expansion is a feasible, less damaging alternative that will adequately provide water and protect the public welfare.

I strongly urge the Coastal Commission to follow your staff's Summary of Staff Recommendation for the Denial of De Novo Permit and the Denial of Regular Permit.

My letter is attached with the reasons for recommendation.

Sincerely,

Joe Lucido (831-372-7537)

California Coastal Commission

September 7, 2020

455 market Street, Suite 228

San Francisco CA 94105

Subject: Staff Report on De Novo Appeal and Consolidated Coastal Development Permit

I have read the California Coastal Commission staff's Summary of Staff Recommendation. I agree with your staff's findings that the Cal Am proposed Monterey Peninsula Water Supply Project (MPWSP) is inconsistent with relevant Coastal Act and LPC policies and that the Commission may not approve the Project despite those inconsistencies because the PWM Expansion is a feasible, less damaging alternative that will adequately provide water and protect the public welfare.

Cal Am and their supporters believe that the MPWSP is the ONLY viable option for the Monterey District, but this believe is not consistent with both the Monterey Peninsula Water Management District's and your staff's findings and recommendations. Cal Am and their supporters desire the MPWSP for their own special interests and they are not always in the best interests of the public welfare, considering all factors.

History gives us an indication of Cal Am's interests. In 1990's Cal Am illegally over drafted the Carmel River for their special interests. Then, in 2006, Cal Am adjudicated the Seaside Basin resulting in the expected overdraft of that local water resource and with the legal requirement to restore this local water resource over a 30-year period (This 30 year period was to start in 2015, but the overdraft of the Seaside Basin continues at this time). For over 25 years Cal Am has promised the development a of safe and secure a water source to remedy their illegal activities. The MPWSP is their latest attempt, but the Project has many outstanding legal and environmental challenges that are extensively addressed in your staff's findings (pages 4 through 11) and many other reliable studies.

Your staff and/or the Monterey Peninsula Water Management District findings support the PWN Expansion over the MPWMD desalination plant.

The only proven project to date is the Pure Water Monterey Projects (PWM) sponsored by the Monterey Peninsula Water Management District and many other Monterey organizations over the last seven years. Cal Am and their supporters have tried every possible legal and technical tactic to deny implementation of the PWM Projects to enhance their own special interests. Cal Am has been a constant obstacle to the expansion of Pure Water Monterey Projects and Cal Am even refused to purchase water from PWM, because they desired to defeat the PWM Projects and pursue their own special interests.

Pure Water Monterey Factors are as follows: PWN Expansion is in the public interest and is a significantly lower cost water supply alternative; PWN Expansion is the feasible and is environmentally preferable alternative; PWN Expansion will give us a new water supply much sooner than the proposed but unproven MPWSP; With the Pure Water Monterey Projects the MPWMD analysis shows that the Pure Water Monterey project now in operation will stop illegal diversions on the Carmel River by December 2021; PWM Expansion provides a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and protecting the Carmel River and the Seaside Basin; and PWM Expansion source water is primarily the 8,000 acre-feet of excess wastewater that is now discharged into the Bay.

MPWSP Factors are as follows: The MPWSP will result in a major impact to the cost of water and the affordability of water to all to all customers in the Monterey District; The MPWSP will be over-sized and over-priced and will dramatically exceed our projected water supply needs; The MPWSP does not have the legal rights to groundwater water that the proposed extraction wells would produce, since these extraction wells (located only onshore that will draw water from onshore resources prior to gaining access to draw offshore seawater) would draw groundwater from an already over drafted groundwater basin (not under the ocean) and would draw water that will impact the legal groundwater supply to the City of Marina; The MPWSP will most likely result in the increased intrusion of seawater within an expanded local coastal onshore area/depth, which has been the major concern of the Seaside Basin Adjudicated Decision of 2006; and The MPWSP will most likely harm the coastal habitat, including the Marina's environmentally sensitive dunes.

My Opinion of Cal Am Accountability

Cal Am has had 25 years to solve or water supply problem, caused by their improper if not illegal actions to over-draft water resources in the Carmel River and Seaside Basin. Without Cal Am's support our local public agencies have developed a solution over the last 6 years that is in the best interests of the Monterey District customers. Cal Am activities have been counter productive to the successful development of the PWN Projects. Cal Am's special interests have not always been in the best interests of the customers of the Monterey District. Cal Am past activities have proved financially harmful and environmentally harmful without any accountability to Cal Am. The full burden for Cal Am's harmful activities has been imposed on the Monterey Community customers. We solve the problems and we pay the financial burden. I believe that we should not give Cal Am and their supports a third opportunity to financially and environmentally harm our Monterey Community by thinking that Cal Am's activities always represent the Monterey District's best interests or by thinking that the cost and technical documentation presented by Cal Am are accurate and provable. The past history shows a proven record of Cal Am deficiencies without any Cal Am accountability.

With the proven and substantiated information provided by Coastal Commission staff, the Monterey Peninsula Water Management staff and the many letters from concern agencies and customers, I strongly urge the Coastal Commission to follow your staff's Summary of Staff Recommendation for the Denial of De Novo Permit and the Denial of Regular Permit.

Sincerely,

Joseph Lucido

25417 Boots Road

Monterey CA 93940

Luster, Tom@Coastal

From: Levi Matsushima <lmatsush@ucsc.edu>
Sent: Monday, September 07, 2020 12:54 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

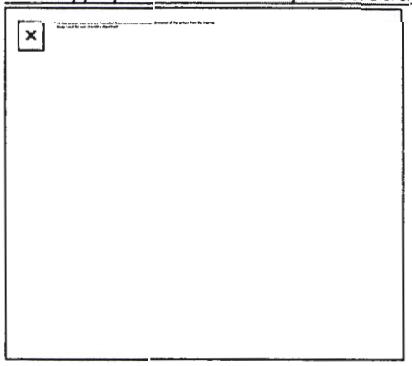
My name is Levi Matsushima; I am a resident of Santa Cruz, but I lived in Marina for 6 years between 2013-2019. I am a CSU Monterey Bay Alumni, currently working towards a PhD at UC Santa Cruz. Marina was my home for those 6 years, and even though I have now moved away I continue to visit and support the City of Marina.

During my time in Marina, I worked as a Water Quality Lab Analyst testing drinking water, irrigation water, and runoff water from around the Monterey Peninsula. I understand the predicament that the Central Coast is facing with the extremely limited supply of water. We are in need of a sustainable source of water that also honors our values of conservation that we hold dear to our hearts in the City of Marina. This project is not sustainable, conservation-minded, or a long-term solution. Instead of building new infrastructure, let us grow the projects we already have at Monterey One.

Please deny this harmful project.

Thanks,

Levi Matsushima
Ayzner Lab
https://ayzner.chemistry.ucsc.edu/



Physical Sciences Building
PSB 186
1156 High Street
Santa Cruz CA 95064

lmatsush@ucsc.edu
Cell: 925.858.5344

Luster, Tom@Coastal

From: Terri Sheldahl <tdsheldahl@gmail.com>
Sent: Monday, September 07, 2020 12:52 PM
To: CalAmMonterey@coastal
Subject: Cal Am's De Sal project

You need to leave Marina alone. We don't want or need you to be involved with our water. We will be fine with Pure Water Monterey Project. Stay away!!!

A Very Concerned Marina Resident

Luster, Tom@Coastal

From: Stefani MIstretta <smistretta@redshift.com>
Sent: Monday, September 07, 2020 11:44 AM
To: CalAmMonterey@coastal
Subject: NO desal

Dear Coastal Commission members,
How many times do we locals on the Monterey Peninsula have to plead that we do not want Cal Am's giantly oversized, expensive, and environmentally wasteful desal plant.

We have a better, cheaper, more environmentally friendly option. Expansion of Pure Water Monterey provides a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and protecting the Carmel River and the Seaside basin. But after 25 years of not solving our water problem, Cal Am is blocking it.

Please support your staff's recommendation of denial.

Thank you,
Stefani Mistretta
1287 Sonoma Avenue
Seaside CA 93955

Luster, Tom@Coastal

From: Sheila Sheppard <deerpaths@yahoo.com>
Sent: Monday, September 07, 2020 10:22 AM
To: CalAmMonterey@coastal
Subject: DENY Cal Am's Desal Plant

Dear Staff,
I am writing regarding the upcoming vote on Cal Am's proposed desal plant.
I just want to encourage you to deny this request. It is both extremely costly and unnecessary given the new source of Pure Water Monterey that is now at hand and ready to deliver. The people of Monterey County clearly demonstrated via vote that they want to move forward with a publicly directed and owned water system. Our public organizations should now help us move in that direction.
If Cal Am is allowed to proceed with this highly questionable approach we know that our water bills will only continue to rise. The cost of building the desal operation will itself be extravagantly high and that too will be passed on to consumers. This has become untenable—-we already have the highest water cost in the entire nation.
Please stand with the people with your votes.
Sincere thanks for your time and attention, Sheila Sheppard

Sent from my iPad

To: CalAmMonterey@coastal.ca.gov
From: Steve Hunt & Family
Subject: Appeal No. A-3-MRA-19-0034; Deny Cal-Am Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Steve Hunt and I have lived in Marina since 1992 where my wife Julie and I have raised three children, all of whom are now adults. I serve the City of Marina as a Public Works Commissioner, Past President of Marina Rotary and co-founder of a 501c(3) nonprofit organization. Not to mention many roles as a volunteer. My wife is a past PTA President and also involved in the community. We will be celebrating our 30th wedding anniversary and cannot attend the Sept 17 meeting which the reason for my letter today.

I am somewhat amazed that this issue is still pressing. Cal-Am attorneys must really have a hold on you and the commission since we are still talking and writing you about this. The only reason Cal-Am chose Marina in the first place is because it was the most simple and profitable solution for Cal-Am and its investors. The proverbial path of least resistance. We all know that if Marina were Pebble Beach these debates would not be taking place. Cal-Am would never challenge the "white" money that is Pebble Beach, Pacific Grove and Monterey for that matter. There are multiple locations south of Marina that Cal-Am could use to desalinate their water without stealing from Marina and you know it. But they chose Marina because they thought we lacked the resources (money & intelligence) to put up a fight.

Also, in addition to water and the quality of water, if you allow Ca-Am to prevail it will mean they will be digging up the streets of Marina in order to install pipelines that deliver Marina water to their treatment facility. Another major disruption. It would also suggest the CCC is either corrupt or incompetent.

Do what is right and Please deny the CalAm Slant Well project!

Luster, Tom@Coastal

From: Pat <plgrant@earthlink.net>
Sent: Monday, September 07, 2020 6:46 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.
Attachments: 20171231_220800.jpg

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff.

I have lived in Marina for over three decades. I enjoyed being the Veterinarian in my lovely little town where neighborhood parties are the norm.

As a Senior Citizen who is now retired, the specter of our city having its ground basin water removed by an out of town slant well project is deeply troubling.

This is the sort of thing that social justice movies are made about.

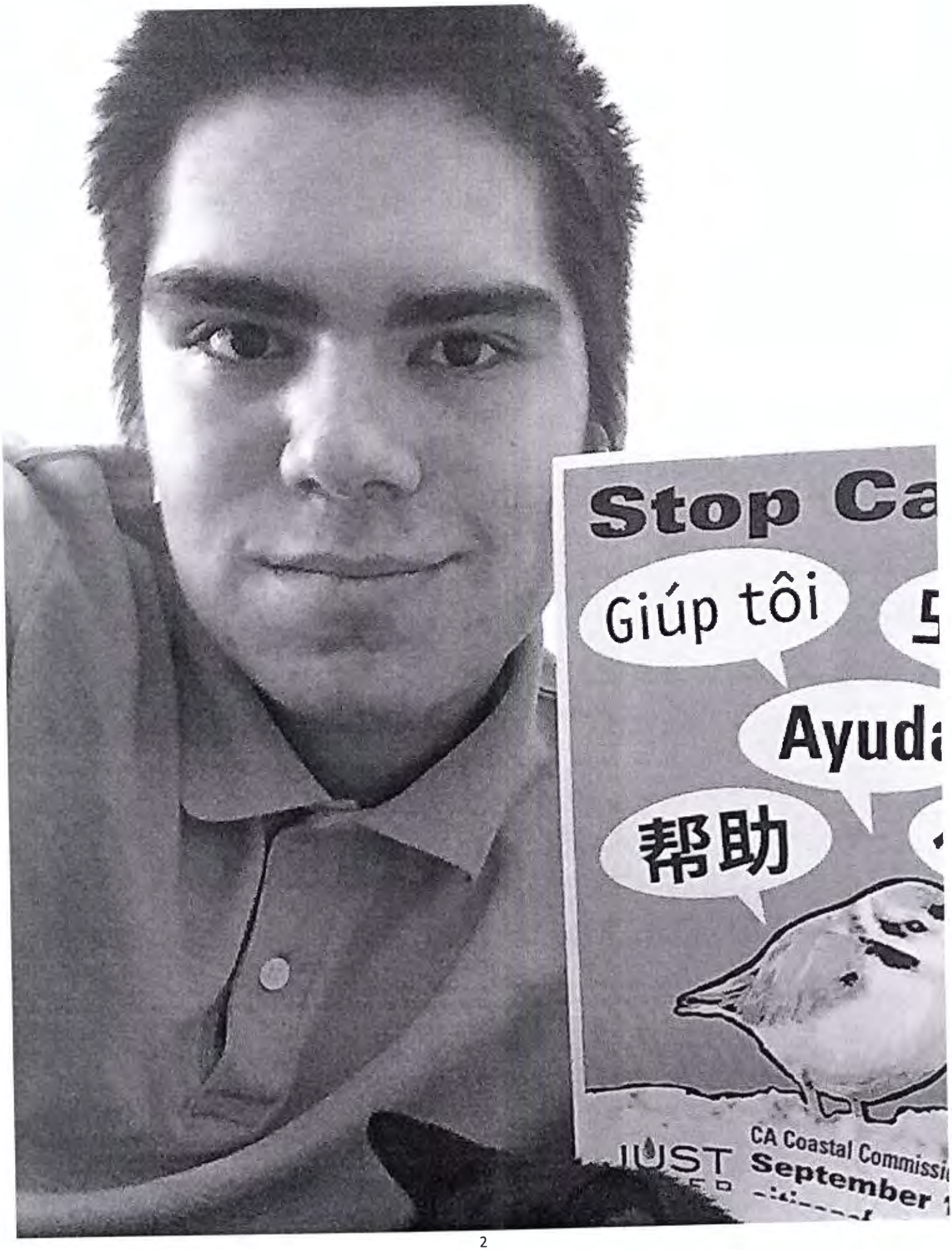
Please be on the side of the hero and stop Cal Am from taking my community's water.

Pat Grant, DVM
454 Forest Circle
Marina, CA 93933

Luster, Tom@Coastal

From: Anthony Santa Ana <21093@gopalma.org>
Sent: Sunday, September 06, 2020 10:20 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:


Stop Ca
Giúp tôi
Ayuda
帮助
CA Coastal Commissi
September

My name is Anthony Santa Ana. I have lived in Salinas all my life. Drinkable water in my area has seen prices steadily rising for years, an unfortunate occurrence when we all depend on it, especially during the current times. Even though a desalination plant would make the situation more economically beneficial for our wallets, we, not just as citizens of Monterey County, but as global citizens of the Earth, have a moral obligation to care for our planet. A desalination plant is a greedy, short-term solution to an expansive and burgeoning long-term issue- one that my high school environmental class has covered extensively. The decision to deny the permit may not be the most glaring financial choice, but, with the health of our lush local area and the situation of the posterity in consideration, the choice is clear. I will be unable to speak at the meeting, but, through this letter, I hope that my concerns have been voiced and that my voice has been heard.

Please deny the CalAm Slant Well project!

Signed,
Anthony Santa Ana

--
Sent from my iPhone

Luster, Tom@Coastal

From: Blake Iverson <21017@gopalma.org>
Sent: Sunday, September 06, 2020 9:55 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:

Hello my name is Blake Iverson and I am a resident of King City. I am in the AP environmental science class at Palma and this cause was recently brought to my attention. Although I do not live in Marina, I feel that it is important that I help the residents get their voices heard in their fight against the Cal Am project. I understand the need for a desalination plant, however it seems unfair that the residents of Marina are being asked to bear the risk and danger involved, especially since the project isn't going to benefit them. I am also concerned, along with the residents of Marina, that the slant wells could cause salt water intrusion and be damaging to the environment and to the safety of the endangered species that call Marina home.

Please deny this harmful project

Thank you for your time,
Blake Iverson

--
Blake Iverson

Luster, Tom@Coastal

From: Timothy Sanders <tds@oxy.edu>
Sent: Sunday, September 06, 2020 8:42 PM
To: CalAmMonterey@coastal
Subject: Subject: Cal Am's Desal Project

Dear Commissioners:

Cal Am's continuing misleading and false assertions, for which it has become notable, now are being organized by Cal Am into a letter-writing campaign intended to promote those unsupportable assertions as if arising from public enthusiasm. **The case against the Cal Am claims, however, is overwhelming**, independent of any attempt to disguise them as arising from popular knowledge and concern.

It is simply **false** to claim that Cal Am's proposed desalination plant (labeled misleadingly the "Monterey Water Supply Project") is "the **only** viable option to supply our community" that meets fundamental needs of the Monterey Peninsula. Your Commission is, of course, very much aware of an *existing alternative water source,* the Pure Water Monterey system with its expansion project.

The[TS1] **Pure Water Monterey Expansion** is **in** fact an **available, feasible** and indeed **superior alternative** water source that meets Cal Am's own stated criteria of being

- **Sustainable** for foreseeable decades
- Capable of **supporting affordable housing**
- Capable of **supporting economic recovery**
- (Most important!) Capable of **restoring the Carmel River and Seaside Basin.**

The Pure Water Monterey Expansion is

- Far **less expensive** both to build and to operate than the proposed desalination plant
- Environmentally much **cleaner**,
  - Using **far less energy**, and correspondingly, until and unless totally renewable energy sources are utilized, generating **far lower greenhouse gas** emissions and air pollution
  - Being **free from seawater and ocean impacts.**

The **additional economic costs of the desalination** alternative to water-recycling **are huge**. The recycling alternative can utilize population and business growth to increase the base resource of recycled water. And the lower price of recycled water compared with desalinated water **reduces the relative costs of living** on the Peninsula and thus supports more-affordable housing.

The **Cal Am proposal** is **substantially oversized**, and since the cost of desalination increases with the degree of underutilization, the excessive size of the Cal Am proposal produces **unnecessary and unwanted inefficiencies**.

All available evidence indicates that the Pure Water Monterey Expansion will be able to deliver water reliably **before** the Monterey Water Supply Project, and therefore will satisfy Cal Am's "as quickly as possible" criterion, **again favoring the water-recycling solution**.

The Monterey Peninsula water resource problem is ***not*** **a crisis**, and the delays and resistance to solution that have exacerbated the problem are principally of Cal-Am's own making.

Through its ***control*** of a *vital human resource*, Cal Am consistently has chosen to grow its **profits in preference to fulfilling** its fundamental obligation to efficiently and faithfully serve the **public's needs and interests**. The Coastal Commission on the other hand is fundamentally committed to the public interest. **By every relevant measure, the Pure Water Monterey Expansion is significantly superior to the Cal Am desal proposal** in pursuit and execution of that commitment, and should be selected as the source for future Monterey Peninsula water requirements.

I **urge you** and your Commission Colleagues therefore to vote to **deny the Cal Am desal proposal** and thereby remove that threat of oversized, over-expensive and environmentally greatly inferior system from the Peninsula's water-dependent future. The **Coastal Commission's thorough Staff report demonstrates clearly and unambiguously that this is the appropriate decision,**

Thank you for your considered attention.

Respectfully,

Timothy D. Sanders
25075 Pine Hills Drive
Carmel, CA 93923
(831) 625-4324

[TS1]

3079 Hermitage Road
Pebble Beach, CA 93953

September 4, 2020

Commissioners
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

SUBJECT: Comments on Items TH3a and TH4a
September 17, 2020 Special Meeting Re: California American Water Company's Monterey Peninsula Water Supply Project

Dear Commissioners:

I urge you to deny California American Water Company's (Cal-Am) Appeal No. A-3-MRA-19-0034 and Application No. 9-19-0198.

The Coastal Commission Staff Report dated August 25, 2020 recommends both of these actions. The Staff Report provides detailed background and reasoning for the staff recommendations. Primary in importance to me are the project costs and the environmental impacts of its construction and operation. An alternative project, expansion of the Pure Water Monterey water recycling and aquifer storage project, is available to allow Cal-Am to cease its illegal water withdrawals from the Carmel River and meet the region's water supply needs, and according to your staff's analysis is the preferable, least environmentally damaging alternative. The cost of water from an expanded Pure Water Monterey project is a fraction of that from Cal-Am's proposed desalination project. In addition, this project could be implemented much more quickly than Cal-Am's desal proposal.

Sincerely,

Andrew M. Bell

Water\20200904.Letter to CCC re Cal-Am appeal & application.doc

Luster, Tom@Coastal

From: ROYCE FOSTER <rdfsearose@comcast.net>
Sent: Sunday, September 06, 2020 7:57 PM
To: CalAmMonterey@coastal
Subject: Appeal No.MRA-19-0034: Deny CalAm Desalination Project Permit

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff

My name is Royce Foster and I am a resident of Marina. My husband Jim and I are retired, and moved here from Carmel and Los Angeles, originally, because of the beautiful, fresh ocean environment and the friendly family-oriented neighborhoods. We are very disappointed that a huge, for-profit company, CalAm, has illegally attempted to take our water, to which they are not entitled,
in order to sell it into other areas at a profit. This will destroy our pristine and fragile coastline and it's natural inhabitants.

Please deny this harmful project. Thank you, Royce Foster

Luster, Tom@Coastal

From: DOUGLAS STEAKLEY <dsteakley@comcast.net>
Sent: Sunday, September 06, 2020 4:07 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Proposal

Subject: Cal Am Desalination Project

I am writing to support your staff's recommendation to deny Cal Am's proposed desalination project. There are numerous reasons why this project should be denied, and perhaps the most salient is that Pure Water Monterey will be able to provide the water Cal Am needs to meet the state's order to stop pumping from the Carmel River quickly, at a significantly lower price, with less environmental damage, and for a longer period of time. Cal Am has stated that the slant wells will have to be re-located in twenty to twenty-five years to an undetermined location that will have new and additional environmental problems.

I have been a Cal Am customer for more than forty years and have watched in dismay as our water bills have increased annually by substantial amounts. As you know, we were charged many millions of dollars by Cal Am for being conscientious and conserving water. Cal Am does not have it's customers' interest at heart, as a privately held company, it is more concerned with increasing profits for shareholders.

Cal Am has been aware of water shortage issues on the Monterey Peninsula for decades and has landed on desal as a water source, not because it is the best or most affordable, but the one that provides them with more revenue. Fortunately, Pure Water Monterey has created a solution that will provide the water we need at a reasonable price.

Other issues surrounding a desalination plant include reduced affordable housing due to increased water costs, increasing water fees for lower income communities, environmental damage, which still has not been fully calculated, a questionable water source for the water the slant wells will use, the unproven technology of slant wells, etc.

Thank you for your thoughtful consideration of our water source for the coming decades, I hope you will concur with staff recommendations and deny Cal Am's permit.

Sincerely,

Doug Steakley

Doug Steakley
Fine Art Photography
Photography Tours and Expeditions

www.douglassteakley.com
P.O. Box 736
Carmel Valley, CA 93924
831.601.0632

Luster, Tom@Coastal

From: Brendan Watson <23107@gopalma.org>
Sent: Sunday, September 06, 2020 2:02 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff,
My name is Brendan Watson and I have lived in Santa Cruz all my life. I go to Palma High School and I am taking an AP Environmental Science class. I believe that this project won't do anything but damage our coastline and jeopardize Marina's main source of drinking water.

Please deny this harmful project! Thank you.

Signed,
Brendan Watson

Luster, Tom@Coastal

From: MWChrislock <mwchrislock@redshift.com>
Sent: Sunday, September 06, 2020 12:25 PM
To: CalAmMonterey@coastal
Subject: Pure Water Monterey Reduces Carmel River Withdrawals

Cedar Street Times • August 30, 2020

Withdrawals from the Carmel River to be Reduced as the Pure Water Monterey Supply Becomes Available

By Mike McCullough, MPA
Director of External Affairs for Monterey One Water

Coming to a tap near you in February, 2021

Monterey, Calif., August 26, 2020 >> A new water supply for the Monterey Peninsula is here. Over the weekend, injection of purified water from the Pure Water Monterey Project into the Seaside Groundwater Basin – a key drinking water source for the Monterey Peninsula – reached 1,000 acre feet. This mile- stone marks completion of the Project's operational reserve and the start of its 1-for-1 replacement water supply to support species and habitats in the Carmel River.

"On behalf of our Board and staff, Monterey One Water is pleased to help in providing cooperative water solutions for the area. It has been a long journey but one where collaboration and innovation have made a difference in developing a sustainable water solution for many years to come," stated Paul Sciuto, General Manager for Monterey One Water (M1W), the Agency responsible for operating and managing Pure Water Monterey.

How does a 1-for-1 replacement water supply work?

The primary goal of Pure Water Monterey is to reduce extractions from the Carmel River. To do this, Pure Water Monterey treats then purifies a variety of wastewaters to stringent drinking water standards. The purified water is injected into the Seaside Groundwater Basin where it mixes with existing groundwater and enhances the water supply for California American (Cal Am) Water's Monterey District. For every acre foot of purified water added to the Basin, Cal Am can increase its dependency on the Seaside Basin by one acre foot and reduce its dependency on the Carmel River by one acre foot.

What is an operational reserve?

The original 1,000 acre feet of purified water injected into the Seaside Groundwater Basin represent an operation reserve for M1W. It gives the Agency flexibility in the future to temporarily decrease production for routine maintenance or capital improvements and can be thought of as a savings account to be used only when needed.

The Monterey Peninsula Water Management District (MPWMD), who manages and allocates available water supplies, was critical in developing and commissioning this new supply. "Together, M1W and District staff performed outstandingly to get us to our 1,000-acre-foot goal ahead of expectations," said Dave Stoldt, MPWMD General Manager. This important milestone introduces a new water supply for residents and businesses.

When will advanced purified water be part of the supply coming out of taps?

Pure Water Monterey is a groundwater replenishment project. Purified water is not pumped directly to homes, rather it is injected into the Seaside Groundwater Basin to assist in sustaining this existing water source. Once purified water is injected into the Basin, it travels through the aquifer for approximately one year before it reaches Cal Am's extraction wells which deliver water to its Monterey District customers. Injection of purified water began in February 2020 and customers can anticipate purified water reaching their taps in late winter/spring of 2021. Extensive monitoring of water quality and travel time confirms the integrity, safety, and progress of the purified water for the life of the project.

Luster, Tom@Coastal

From: Marlene Tise <tise455@aol.com>
Sent: Sunday, September 06, 2020 11:35 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034, Deny CalAm Desalination Project Permit

Dear CA Coastal Commission:

My name is Marlene Tise and I have been living on the Monterey Peninsula since 1974 and in Marina since 1982. I love this area and feel the Slant Well project will be detrimental to Marina in particular, but eventually to the rest of the area also. We have a safe alternative for increasing our water supply with the Pure Water complex and should utilize and expand that before building a desal system that draws from our groundwater systems.

Please deny the CalAm desalination plant permit.

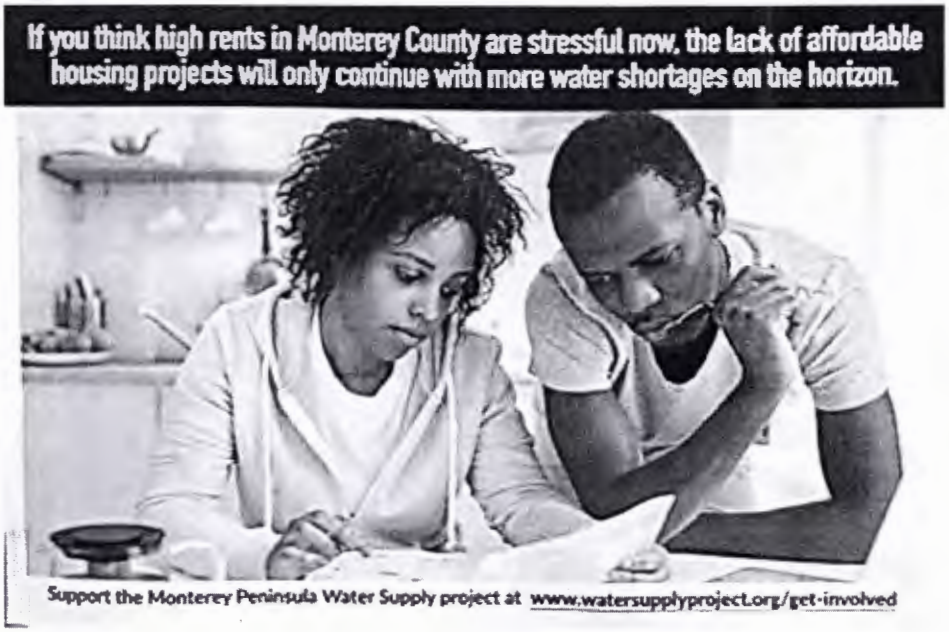
Thank you.
Marlene Tise

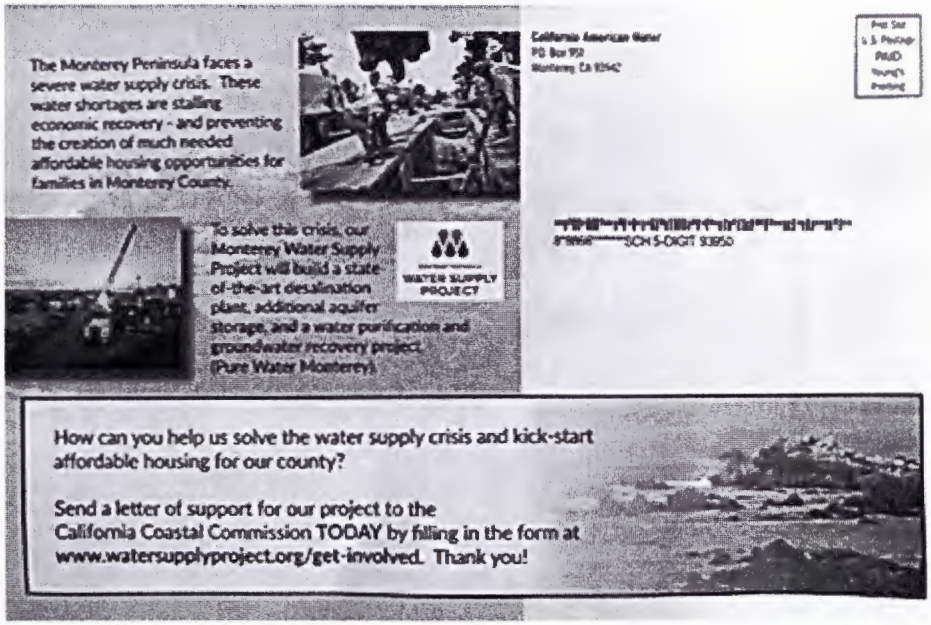
Luster, Tom@Coastal

From: Michael Ostovich <setman1@hotmail.com>
Sent: Sunday, September 06, 2020 11:33 AM
To: CalAmMonterey@coastal
Subject: CalAm trickery

Dear Commissioners:

This mailer shown below is the latest effort by Cal Am to get their unnecessary desal plant built (at an exorbitant price for Monterey Peninsula ratepayers:





California American Water is attempting to dupe their customers into appealing to directly you to approve the permit for the desal project in order to maintain their strangle-hold on our water. Please recognize the fallacy or their message, claiming desal is needed to keep rents low.

The desal plant will double water costs for the Peninsula... higher rents will be inevitable. Wealthy ratepayers can absorb the costs, but average and struggling ratepayers will be deeply affected.

Our best, least-expensive, fastest, and environmentally-safest solution for sustainable water for our area is available through the Pure Water Monterey recycled water project.

Please follow the findings of your own staff and deny the permit.

Michael Ostovich
(831) 207-6078

Luster, Tom@Coastal

From: CHERYL CAPECE <dcapece743@aol.com>
Sent: Sunday, September 06, 2020 11:32 AM
To: CalAmMonterey@coastal
Subject: Public Comment on September 2020 Agenda Item undefined 3a - Appeal No. A-3-MRA-19-0034 (California American Water Company, et. al., Monterey Co.)

Dear CA Coastal Commissioner, Executive Director John AInsworth and staff

My name is Cheryl Capece. My husband Dave and I are retired and live in Marina. Marina has always protected the coast, assuring access to everyone.
Water is extremely important to our community, and Cal Am should not be allowed to steal it from us.
Please deny the CalAm Slant Well project!
Thank You
Cheryl Capece

Luster, Tom@Coastal

From: ecklesmpg@aol.com
Sent: Sunday, September 06, 2020 11:29 AM
To: CalAmMonterey@coastal
Subject: Sept 17 meeting regarding desal

Dear ladies and gentlemen of the Coastal Commission, and for Greta

If you simply peruse peninsula neighborhoods to see a growing blight brought about by among the most expensive water in the country, we residents can't live with the CalAm knee pressed upon our surroundings and pocket backs...

Your staff findings to recommend against the slant wells are absolutely correct..Desal slant wells are for water as fracking is for oil; an ecologic and economic CalAmity, CalAM seeks to press upon us.

CalAm has engaged in every conniving, lying maneuver imaginable to retain their control over the public's resource- their cash cow.

As to their veracity, in an earlier round, parading a person before the media to proclaim what a bad deal it was for Felton residents to buy CalAM. Being an old Felton resident, one afternoon I interviewed residents in shops, religious centers, the police and fire departments, grocery store, and every person expressed how pleased they were with their accomplishment. and shook their heads incredulous at to what could motivate the person to be a spokesperson for CalAm.

If you ever visited the San Clemente Dam site it was obvious there was no sign of ANY upkeep of the dam or reservoir. A Carmel Valley resident told me about the non-disclosure agreement a property owner entered to have the material removed from the silted-in reservoir and deposited in his nearby canyon. It became easier, politically correct, and at no expense to CalAm to have their private maintenance problem become a $55,000,00 public liability. (With weather extremes a well designed, modern dam will ultimately prove to be a crucial structure for all living creatures and to protect the many millions of dollars of property downstream; see Los Vaqueros reservoir.)

Among the litany, how about the "misplaced" sensor that gave erroneous salinity readings in the test well. See also the Stanford ground penetrating radar study.

For thirty years, we three Leos often met from San Luis Obispo to Santa Barbara (dinner at Ostini's Hitching Post II in Casmalia) where we encountered Hollister Ranch with its remote, pristine ocean-front, restricted from the public. Makes Martin's Beach a postage stamp. How could that possibly be? A local told us. It's creation occurred prior to the Ca Coastal Comm! Please do not allow the desal CalAmity to be set upon us all, with its deleterious energy effects.

Very truly yours, Mark Magruder Eckles Pacific Grove Ca 831-241-8940 1040 Olmsted Ave

Luster, Tom@Coastal

From: LEON HELLER <leonoid@comcast.net>
Sent: Sunday, September 06, 2020 10:13 AM
To: CalAmMonterey@coastal; leonoid@comcast.net
Subject: CalAm Desal Plant

As a long time resident of Marina, I strenuously object to CalAm"s desal plant project to take water from Marina,
and ship the water to the Monterey Peninsula, especially since there is a viable alternative.(Pure Water Expansion).
This project is nothing more than a rob Peter (Marina water) to pay Paul (mitigate CalAm's overpumping of the Carmel River).
To add insult to injury, not one drop of water from the desal project will go to Marina...Bummer.

Question: Will CalAm be held responsible for making Marina's water undrinkable in the future due to salt contamination?
Could happen!...PG&E shelled out over 300 million to settle legal claims involving contamination in Hinkley CA (Erin Brockovich).
Perhaps, the Coastal Commission should consider having CalAm post a 300 million dollar bond to pay for any future litigation.

Question: Will the state of California be held responsible for making Marina's water undrinkable in the future if the
Coastal Commission approves CalAm's desal plant project?...Could happen!...Recently the state of Michigan has agreed to pay the
city of Flint Michigan 600 million for its part in contaminating Flint,s water with lead.

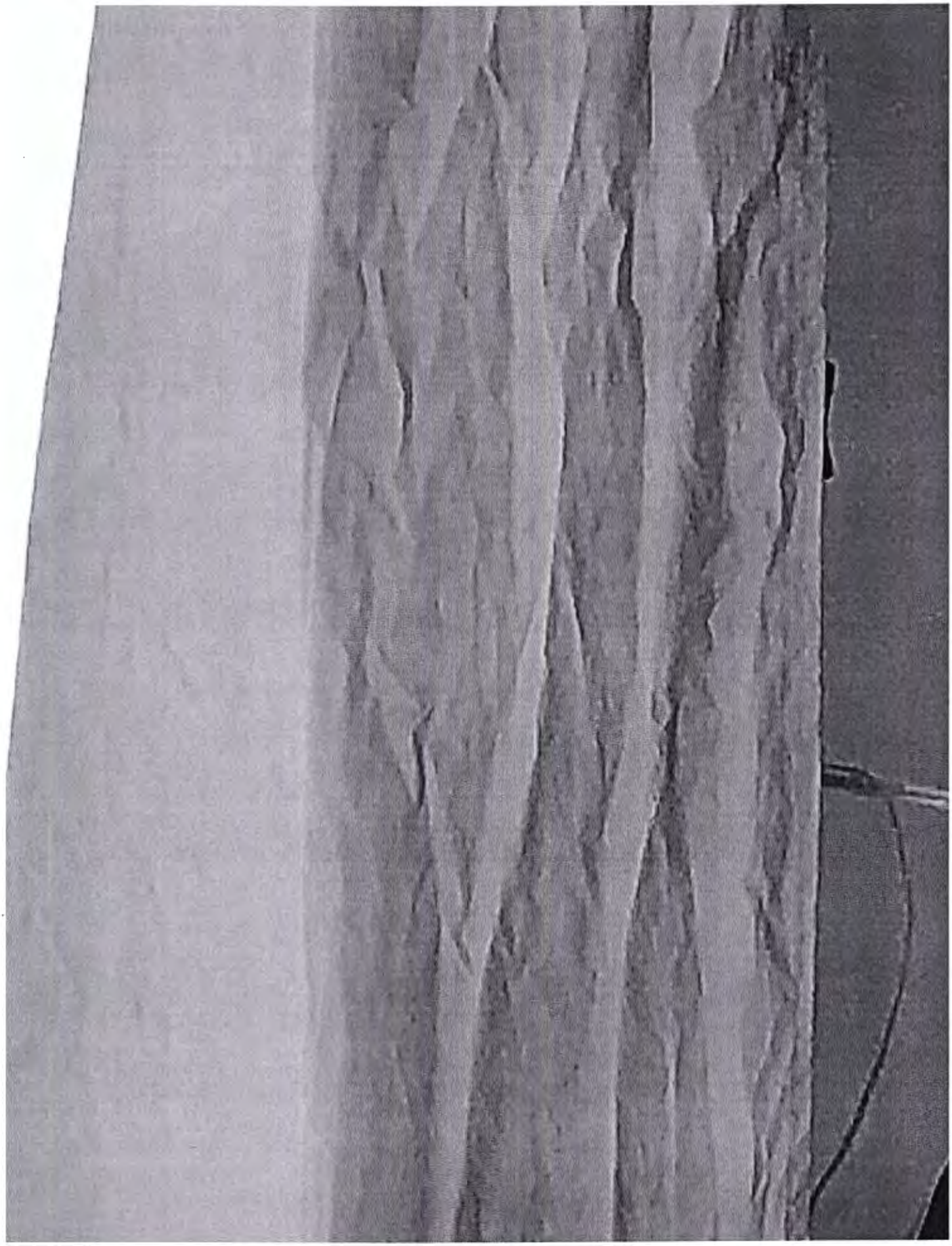
"Whiskey is for drinking, water is for fighting." Twain

Leon E. Heller
Marina CA

Luster, Tom@Coastal

From: Katherine Biala <kybiala@icloud.com>
Sent: Sunday, September 06, 2020 8:42 AM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff:



Marina and the Ord Communities have done everything we could as a community to engage our residents in this fight for our future! I know you have listened to us over the last four years and please understand that this is an extraordinary feat for any community, let alone a disadvantaged community to continue to persevere! We implore you to deny the CalAm Slant Well project!

Thank you,

Kathy Biala, resident of Marina

Kathy Biala
kybiala@icloud.com
cell: 831-242-0023
Mailing address: 3012 Crescent St.
Marina, CA 93933

Luster, Tom@Coastal

From: Tina Walsh <tinainmarina@redshift.com>
Sent: Saturday, September 05, 2020 7:14 PM
To: CalAmMonterey@coastal
Subject: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit

Dear California Coastal Commissioners, Executive Director John Ainsworth and staff:

My name is Tina Walsh; I am a resident of Marina, California and lifelong resident of Monterey County. As a fixed income older person and widow of a Vietnam veteran, I live a simple life and appreciate the small, free pleasures living near the coast can bring as I observe the birds and dune plants that exist in my community. Especially exciting to me is the possibility of spotting a Smith's Blue Butterfly!

I urge you to vote for denial of the Cal Am project which came to us uninvited and brings to us harm instead of benefits. The intended recipients of the desalinated output water don't even want it because of its high cost. Expansion of the Pure Water Monterey project has been identified as a feasible alternative with less damaging impacts to our ESHA, public enjoyment, and local groundwater issues.

Please say no to this harmful project. Thank you for your consideration.

Sincerely,

Justina Walsh

Sent from Mail for Windows 10

Luster, Tom@Coastal

From: Karen Paull <karenppaull@gmail.com>
Sent: Saturday, September 05, 2020 6:45 PM
To: CalAmMonterey@coastal
Subject: Public Comment on September 2020 Agenda Item undefined 3a - Appeal No. A-3-MRA-19-0034 (California American Water Company, et. al., Monterey Co.)

Commissioners,

I write to you as a resident of Pacific Grove. I was an attorney at the CPUC for 15 years; for four of those years, Chief Counsel for the CPUC's Office of Ratepayer Advocates. I retired in 2014 and moved to Pacific Grove in 2018.

Commissioners, I urge you to adopt the staff recommendation to deny a coastal permit for Cal Am's desalination plant in Marina. The staff report presents overwhelming evidence in support of its recommendation. Pure Water Monterey Expansion is a feasible and environmentally preferable alternative. It would make it possible to stop illegal withdrawals from the Carmel River by December 2021. The environmental issues facing the Carmel River can be resolved without Cal Am's desal plant.

Furthermore, Pure Water Monterey Expansion can meet the supply needs of the Monterey Peninsula at a far lower cost. The cost issue is important. Cal Am's customers on the Monterey Peninsula already pay the highest costs in the country. The proposed desal plant would drive rates even higher. This is in a region with a high cost of living and a largely low-paid workforce.

Cal Am has argued that the desal plant is necessary to build affordable housing. This argument is disingenuous. You can't have affordable housing without affordable water. Pure Water Expansion can meet the region's needs at a much lower cost.

Is Cal Am's proposed desal plant even feasible? Probably not! Even if the Commission were to issue a permit, it seems unlikely that the plant could be built in this location. Cal Am doesn't have the necessary groundwater rights, and cannot acquire them. The staff report also identified unresolved environmental impact issues that at the very least, require further study before a permit can be issued. The project's unproven slant well technology is another source of uncertainty. And what about the impact of rising sea level? How long before the wells would need to be moved inland? Cal Am doesn't own land inland.

None of these hurdles apply to Pure Water Monterey Expansion. It is much more likely to succeed in bringing a new supply of water to the region.

I hope you will also give serious consideration to the environmental justice issue. The City of Marina should not be required to sacrifice its precious coastal resources to a project that would bring no benefit whatsoever to its residents, only burdens.

For all of these reasons, you should adopt the staff's recommendation and deny the permit.

Respectfully,

Karen Paull
Pacific Grove

Luster, Tom@Coastal

From: Jose Rafael Ramos <joserafaelramos@yahoo.com>
Sent: Saturday, September 05, 2020 6:23 PM
To: CalAmMonterey@coastal
Subject: Appeal No: A-3-MRA-19-0034 CalAmDesal Project

Cal Am's Desal project is not in the public interest because--

1. As a mater of social justice it would double the price or water in the area which it serves when the water it distributes is already the most expensive in the nation, and

2. The Pure Water Monterey Expansion will give us a sufficient new water supply at much less cost and sooner than desalination.

Clearly, the feasible and environmentally. preferable alternative is the Pure Water Monterey Expansion.

Make CalAm follow through on the delivery of recycled water or revoke its franchise to distribute water on the Monterey Peninsula.

José Rafael Ramos, Esq.
74 Via Descanso
Monterey, California 93940-6110
(831) 655 1555

To: California Coastal Commission Staff September 5, 2020

Cal Am's Desal Project

Application No.: 9-19-0198

Dear Commissioners,

I am writing to you today to address the application from Cal Am for their Desal Project on the Monterey Peninsula. You will be voting on this on September 17 – just over a week away. I urge the Commission in the strongest terms to deny that application, based upon all the reasons that your staff recommended denial.

- Cal Am's Desal project is not in the public interest.
- Pure Water Monterey Expansion is the feasible and environmentally preferable alternative. It will give us a new water supply much sooner than desal.
- Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021. The environmental issues facing the Carmel River have been resolved without Cal Am's desal.
- The Peninsula will not be able to build workforce housing until we get a new water supply. We have it in our sights to provide this much needed housing so people who work on the Peninsula can afford to live here and not have to drive an hour or more each way to work.
- Also, the Pure Water Monterey expansion will be a much more affordable way to ensure a sustainable water supply that the Peninsula's lower income earners could actually afford.
- Cal Am is the only obstacle to the expansion of Pure Water Monterey.
- Desal damages the environment – it would harm the dunes which provide a habitat for threatened and rare species.
- Cal Am's project is a major offense to environmental injustice, which was clearly pointed out by the CCC Staff report on this proposal.

Thank you for your years of attention to this issue. It has been a real struggle. I urge you to deny this application so that the Peninsula can move forward.

Respectfully,

Amy Anderson

Amy Anderson, PhD

Carmel, CA

Luster, Tom@Coastal

From: Lisa St.Mary <lstmary@sbcglobal.net>
Sent: Saturday, September 05, 2020 3:24 PM
To: CalAmMonterey@coastal
Subject: I am against desalination plant

Dear Commissioner,

Owing to the fact that EVERYTHING CalAm has done for decades and continues to do to manipulate and promote their interests first—how on Earth could anyone support giving them stewardship of any desal facilities??

They have proven themselves the worst of stewards for decades. Their profit margins are sinful and made on the backs of hard working citizens. How many companies have the HUGE GUARANTEED profit margins Cal Am is ensured?? They are an abusive and one sided entity and they have been blowing in the ear of the Coastal Commission for way too long.

I have been heartened that as of late the Coastal Commission has finally found their 'sea legs' pardon the pun—and have said no to them once or twice. Good on you.

Please quit believing the 'spun sugar' of Cal Am's Catherine Stedman with her 'sing-song' voice, deceptive presentations and half truths. That dog and pony show has been trotted out far too many years.

It would be important on this upcoming decision—more than any other—to REFUSE Cal Am's ridiculous request. The cogent points below more than ratify this position:

Key points to draw from:

– Cal Am's Desal project is not in the public interest
– Pure Water Monterey Expansion is the feasible and environmentally preferable alternative
– It will give us a new water supply much sooner than desal
– Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021. The environmental issues facing the Carmel River have been resolved without Cal Am's desal.
– There is no water supply crisis
– No Affordable housing without affordable water. Cal Am's desal would double our water bills.
– We don't need Cal Am's oversized, over priced desal project to provide our future water supply
– Expansion of Pure Water Monterey provides a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and protecting the Carmel River and the Seaside basin.
– Cal Am is the only obstacle to the expansion of Pure Water Monterey.
– Cal Am cannot be trusted. Passing Measure J was the community's statement
– Desal damages the environment, costs too much and creates environmental

injustice
– Desal harms the coastal habitat and Marina's beautiful dunes
– Desal has no legal source water, it would draw groundwater from an overdrafted groundwater basin NOT under the ocean
– PWM Expansion source water is primarily the 8,000 acre-feet of excess wastewater that is now discharged into the Bay. It is contractually secure and drought proof
– Orange County has used this same system for decades
– Cal Am has had 25 years to solve or water supply problem
– Our public agencies have solved it in the last 6 years. Now all the water we need for decades is available, but Cal Am is blocking it.

Thank you for considering my letter.

Sincerely,
Lisa St Mary

Sent from my iPhone

Luster, Tom@Coastal

From: Natalie Gibson <natalie.h.gibson@gmail.com>
Sent: Saturday, September 05, 2020 3:09 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

Dear California Coastal Commission Representative,

Cal Am's Desal project is not in the public interest and Pure Water Monterey Expansion is the feasible and environmentally preferable alternative. It will give us a new water supply much sooner than a desal plant would be able to. Our new water supply from Pure Water Monterey will allow us to restore the Carmel River by December 2021. Cal Am's desal would double our water bills. We don't need Cal Am's oversized, over priced desal project to provide our future water supply.

Cal Am is the only obstacle to the expansion of Pure Water Monterey. Cal Am cannot be trusted. Passing Measure J was the community's statement. Desal damages the environment, costs too much and creates environmental injustice. Desal harms the coastal habitat and Marina's beautiful dunes. Desal has no legal source water, it would draw groundwater from an overdrafted groundwater basin NOT under the ocean.

Orange County has used this same system for decades without incident. Cal Am is a FOR-PROFIT business and has no interest in serving the public good. They are selling us something that every human has a right to. WATER. Let it become a public issue so it can be dealt with fairly, economically and responsibly.
Please DENY the DESAL PLANT and put Cal Am in their place.

Sincerely,
Natalie Gibson
Monterey Resident for 40 years
831-277-9261

September 5, 2020

Dear Chairman Padilla and Commissioners of the CCC,

...and so, we come to the culmination of a long six-year process that I have been involved in every step of the way. I'm going to treat this letter as if I had 5 minutes to speak, to keep it under 1,000 words...

My name is Michael Baer. I was a resident of the Monterey Peninsula from August of 1982 until May of 2019... over 36 years. I moved to San Jose, the town I grew up in, in May of 2019 to help my ailing parents. I have remained active in the Monterey Peninsula Water Supply Project (MPWSP) despite the move. This is too important to me, and I have invested too much time and energy to stop merely by changing my address 70 miles north.

I first became involved in the local water issues in November of 2013, so I had already been at it a year, when I came to that fateful meeting in Half Moon Bay in November of 2014, where the Commission considered the decision of the test slant well permit, which was approved. Thus began an odyssey, and those Commissioners who have been around these last six years, probably recall me chasing you all over the state on this issue.

So here we are again... and likely for the last time.

Staff got it right, please deny the local coastal permit for the desal plant. Do your substantial part to bring this nightmare to a close.

There is so much wrong with this project which is amply and cogently covered in the staff report. You will no doubt be hearing the numerous arguments from many dozens of advocates commenting against the plant, as well as the handful of tired and misleading arguments from the proponents for the desal.

With so much to cover, the question is where to point the laser. I always try to add a novel perspective, or at least present in a novel way, to actually add value to your deliberations. What can I say now that we have reached this point?

I want to talk about the other side, the business and political allies that Cal Am has cobbled together for support.

On the political side, you "old timers" will recall, that a JPA was formed called the Monterey Peninsula Regional Water Authority (MPWRA) comprised of the six Peninsula mayors from the six Peninsula cities (Monterey, Seaside, Carmel, Pacific Grove, Del Rey Oaks, and Sand City). The fact that a community of less than 100,000 people is divided into six city jurisdictions (not to mention an additional nearly ten thousand county residents within Cal Am's borders) is

one of the main reasons Cal Am can create so much mischief. There are so many different stress points they can leverage politically and financially.

The MPWRA was often referred to as "the mayors authority" and it was the brainchild and chaired by Jason Burnett, who was the mayor of Carmel, a young aspiring politician, and grandson of David Packard, nephew to Julie Packard, the director of the world renowned Monterey Bay Aquarium. He developed a unanimous coalition of all the mayors, with the mission to unify the Peninsula to meet their long-standing problems of sufficient, sustainable water supply and resolve the CDO from the SWRCB to reduce the draw from the Carmel River.

Jason Burnett admitted more than once publicly that the "mayor's authority" had no actual authority. They were not beholden to their respective city councils nor the constituents who voted them to office. They simply worked as self-appointed lobbyists to help resolve the water supply problem in their self - perceived interests, which coincidently aligned with Cal Am wholeheartedly.

As previously mentioned, there was no representation for the county residents in unincorporated Carmel Valley, Carmel Highlands, or Pebble Beach, nor any other unincorporated areas in Cal Am's district.

Do you want to know who else wasn't at the table? Every single person who has been clambering before you to kill the project for the last six years.

I think it's instructive to note that not a single one of the six mayors on the MPWRA who came to you in 2014 was an elected official after the 2018 election. Some retired, and some were defeated. The first to leave was Jason Burnett himself, who retired in 2016 and took his family to Washington D.C.

That is the political side of the story, but there is also the commercial interests, Hospitality, Real Estate, and the local Chambers of Commerce make up the lions share, but there are other smaller, sometimes non-profit interests, who support Cal Am. Salinas Valley Agriculture is the largest business in the County; they support Cal Am too, even though they are entirely outside the boundaries of Cal Am's customer base. Why do they care so much, and flex their muscles? I'm not entirely sure.

But I submit to you that every single proponent for the project, from those listed above, to Paul Bruno of MPE which has a million dollar contract to trench the pipelines, to Castroville Services Committee, which would receive water at about 2 cents on the dollar to produce it, to low wage employees of the hospitality industry who will tell you they need that water so they can have a job...

All of them, every one, if you dig deep enough you will find they receive some financial benefit, while very few of them will see the cost on their water bill as residents, because few are residents within the Cal Am district.

This is the debate before you. Staff has laid out beautifully all the reasons why this project is fatally flawed. We've been saying it for the last several years.

Thank you for your service, your time, and your consideration.

Sincerely,

Michael Baer

Luster, Tom@Coastal

From: TAMMIE TIMMION <adagio3737@aol.com>
Sent: Saturday, September 05, 2020 11:32 AM
To: CalAmMonterey@coastal
Subject: Cal Am's Desalination Project Proposal at the current controversial CeMex sand mining site Near Marina, CA

I attended the coastal commission meeting held in Half Moon Bay last year regarding this subject. As you may know there was incredible community outrage and opposition to this proposal. The expert on desalination for the state of CA spoke also summarizing why this site is a very poor choice. Some extremely well educated and articulate members of our community spoke along with scholars on all aspects concerning this matter. No one that does not stand to be personally enriched by this boondoggle is advocating for approval of this desalination project.
Why Cal Am continues to push for this desal project at this very unsuitable location instead of finding an acceptable location shows how reckless this extremely profitable corporation is to everyone other than those shareholders and speculators.
PLEASE END THIS MADNESS! Cal Am has shown our community that it's profit motive is a major obstacle to our water resource. Eventually our community will rise up and take control of this vital public resource. Help us begin to untangle the stranglehold Cal Am has on the communities of the Monterey Bay!
Stand up to this extremely profitable New Jersey Corporation !
Thank you.
T Timmion

Sent from my iPhone

Luster, Tom@Coastal

From: tbharris146@aol.com
Sent: Saturday, September 05, 2020 9:58 AM
To: CalAmMonterey@coastal
Subject: desal project

Commissioners: I have lived in Monterey Co for over 40 years. 30+ years ago we bought a home that was in the Bishop water co. area of service. Our home has a pool. The water was / is awful but plentiful and affordable.
Cal am bought Bishop water several years ago. This past summer my bills have been high $400, $500, (water in the pool $800), $400. We have two families, (8 people) in the house and Cal Am's tiered billing is a killer. The costs will be unmanageable if the desal plant is allowed. It is not needed. **I urge you to follow the advice of your staff report** and deny the desal project for so many reasons. Thank you, Tamara Harris 10175 Sunstar Rd. Monterey CA.

Luster, Tom@Coastal

From: Jane Bell <ajjbell@redshift.com>
Sent: Friday, September 04, 2020 9:48 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project, Vote NO. We support CA Coastal Commission Staff Report Recommendations against Desalination Project.

Dear California Coastal Commission,

Thank you for all that you do to protect California's precious coast. With regard to our issue here on the Monterey Peninsula, I urge you to uphold the thorough CCC Staff report in support of the City of Marina Planning Department decision against the California American Water desalination project and CCC Staff's recommendation for denial of Cal-Am's application for that project. Among the many reasons I oppose the desalination project is a new one. This community, which already has expensive water, is grappling with the effects of the Covid 19 epidemic. It has been damaging to hotels, restaurants, government services, small and large business and so many individuals and families. We cannot afford this experimental plant with unresolved issues that would impact acres of coastal dunes. AND there is a reasonable, less costly, and ready to implement alternative in the Pure Water Monterey project.

Please note that California American Water Company has sent out a flyer recently, quite deceptive and misguided in tying water to affordable housing. They ask that the addressee click on a form that will generate support for their desalination plant. I fear that many people will be confused by the label, "Monterey Water Supply Project," the description of which includes other projects besides the desalination project.

With much gratitude,

Jane R. Bell, MPH

Luster, Tom@Coastal

From:	Andy Bell <amacbell@redshift.com>
Sent:	Friday, September 04, 2020 9:26 PM
To:	CalAmMonterey@coastal
Subject:	Comments on September 17, 2020 Agenda Item TH3a - Appeal No. A-3-MRA-19-0034 (California American Water Company)
Attachments:	20200904.Letter to CCC re Cal-Am appeal & application.doc

3079 Hermitage Road
Pebble Beach, CA 93953

September 4, 2020

Commissioners
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

SUBJECT: Comments on Items TH3a and TH4a
September 17, 2020 Special Meeting Re: California American Water Company's Monterey Peninsula Water Supply Project

Dear Commissioners:

I urge you to deny California American Water Company's (Cal-Am) Appeal No. A-3-MRA-19-0034 and Application No. 9-19-0198.

The Coastal Commission Staff Report dated August 25, 2020 recommends both of these actions. The Staff Report provides detailed background and reasoning for the staff recommendations. Primary in importance to me are the project costs and the environmental impacts of its construction and operation. An alternative project, expansion of the Pure Water Monterey water recycling and aquifer storage project, is available to allow Cal-Am to cease its illegal water withdrawals from the Carmel River and meet the region's water supply needs, and according to your staff's analysis is the preferable, least environmentally damaging alternative. The cost of water from an expanded Pure Water Monterey project is a fraction of that from Cal-Am's proposed desalination project. In addition, this project could be implemented much more quickly than Cal-Am's desal proposal.

Sincerely,

Andrew M. Bell

[These comments are also attached as a Word document.]

Luster, Tom@Coastal

From: Robert Melton <robertjmelton@yahoo.com>
Sent: Friday, September 04, 2020 7:08 PM
To: CalAmMonterey@coastal
Subject: Commission Staff recomendations - support

September 3, 2020

To: Chair Steve Padilla and California Coastal Commissioners and Staff
From: Robert Melton MD, MPH
Re: Coastal Development Proposal from California American Water

I urge the Commissioners to support the recommendations of Commission Staff and deny the Coastal Development Permit for the desalination plant proposed by California American Water.

The need for the proposed plant has been obviated by the local community's Pure Water project that is now increasing the supply of potable water to the service area. At the same time, our consistent efforts at water conservation have significantly lowered the demand for water. The data on which the need for the original desal plant was based are now obsolete. We can meet current and future demand for water, including future growth and development, with Pure Water Monterey and the Pure Water Expansion.

During my twenty years as Public Health Officer and Director of the Monterey County Health Department I was responsible for the oversight of drinking water systems for small communities throughout Monterey County, and thus became aware of need to promote access to and quality of drinking water for all residents and visitors. Protection of ground water aquifers from contamination and runoff was an essential part of our staff's work. From this I learned of the long-term consequences of seemingly low-risk events and the costs of rebuilding systems that have been damaged. The risks from the proposed desal plant may be difficult to quantify, but the consequences of contamination of Marina's water supply would be long-lasting and irreversible.

I also recognize safe drinking water as an essential public good that must be available to all without regard for income or residency status.
An important aspect of access to water is cost. Monterey County's population is largely made up of moderate and low-income workers in the agricultural, hospitality and tourism sectors. These and other low income people may not be present to testify today, but their wellbeing matters very much. The desal plant proposed by California American water has become an expensive and environmentally risky project that would impose a very significant financial burden on ratepayers from these working families, without providing real benefits to them that justify its high additional economic and environmental costs.

Sincerely,

Robert J. Melton, MD, MPH
Carmel Valley CA

Luster, Tom@Coastal

From: M Melton <ccapacv@yahoo.com>
Sent: Friday, September 04, 2020 1:38 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

September 4, 2020

To: Chairman Steve Padilla and the California Coastal Commissioners and Staff:

Please support your staff's exhaustively researched and carefully reasoned recommendation to deny a Coastal Development permit for Cal Am's proposed desal project.

I believe that communities are capable of solving difficult problems in ways that benefit diverse interests and can create unexpected win-wins for all their residents and the environment, too.

Pure Water Monterey (PWM) and its Expansion are strong examples of this. After 20 years of Cal Am's failures, a coalition of local public agencies developed Pure Water Monterey in just six years. Expansion of Pure Water Monterey will provide a long-term sustainable water source that is capable of supporting affordable housing with affordable water. It will help us create a strong economic recovery and protect the Carmel River and the Seaside basin.

The PWM Expansion has an assured, drought-proof water supply. Its capital costs are roughly a quarter to a third of the cost Cal-Am's desal—and an even smaller fraction when the full cost, including interest over the life of the desal project is included. The water from Pure Water Monterey and the Pure Water Expansion projects is expected to cost between $2,245 and $3,000 per acre-foot (AF). Cal Am's desal would be more than two to three times as costly ($7,000 to $8000 per acre-foot).

Both Pure Water Monterey and its Expansion are well engineered. The Pure Water project description anticipated that its first-year production would be about 1,000 AF per year, not 3,500 AF. Based on current progress, Pure Water Monterey will be up and running in time to supply the full 3500 AFso we can comply with the State Water Resources Control Board's pumping limitations for the Carmel River by December 31, 2021. It seems odd that Cal Am claims an 18 month delay during a pandemic is a major PWM flaw, given its own 25 years of failures that were (and are) costly for ratepayers but profitable for Cal Am. The most recent example is that somehow, its engineers forgot that water doesn't run uphill and that it wouldn't be able to deliver the PWM water unless it added unexpected charges for more equipment to our bills.

Thank you for contacting low income residents in all the affected communities. While Monterey Peninsula residents are sympathetic to low income Castroville residents who need water, we believe the agricultural firms who caused the depletion and saltwater intrusion need to help them. There are more than 21,000 low income residents on the Monterey Peninsula, more than 5 times as many as there are in Castroville. They did not cause Castroville's depletion and saltwater intrusion, cannot afford to correct it, and already struggle to pay for some of the most expensive water in the nation.

Cal Am often cites the California Public Utility Commission's (CPUC) approval of its project and the large projected demand for its desal as if it were law. Please do not rely on these outdated figures or

the CPUC's supply and demand numbers or its environmental impact conclusions. Today's CPUC Commissioners have recently shown they are strongly committed to using current data and are willing to update and discard past findings that are no longer correct and discard policies that can no longer be justified.
If, in the future, global warming worsens dramatically, the PWM Expansion will allow us to build a better sited, technologically advanced, efficient, environmentally sustainable, nonprofit regional desal facility that meets our needs.

Today, Pure Water Monterey will allow us to lift the CDO more quickly than the proposed desal. PWM plus the Expansion will have the source water, location, and reliable functionality to assure a better future for salmon while also protecting the snowy plover, vernal pools and important coastal habitats. Equally important, the PWM Expansion will allow more affordable futures, greater fairness and better coastal access for many local people, including the disadvantaged. Unlike Cal Am's desal, the Pure Water Expansion will not create hazards, suffer from erosion or cause it in trying to protect its pipes, or pose any risk to the residents of Marina.

Thank you again for the Commission staff's very careful review, based on current evidence. Please support its findings that denial of the proposed Project will not harm the public welfare and that the Pure Water Expansion is a feasible and better alternative.

In closing, I would also like to appreciate and thank Chairman Padilla for his valiant fight to survive and recover from Covid-19 and for his very moving account of his experiences and those of his daughter.

Sincerely,

Marli Melton

Marli Melton, Carmel Valley

Luster, Tom@Coastal

From: Charles Cech <ccech1@gmail.com>
Sent: Friday, September 04, 2020 8:18 AM
To: CalAmMonterey@coastal
Subject: Slant Well Ground Water? Attachment
Attachments: # # Slant Well Ground Water.docx

How much Desalinated Water Will Need to Be Returned?

The following information was found in Cal Am's Test Slant Well Long Term Pumping Monitoring Report Number 168 dated 1/21/2020

Instead of drawing seawater from Monterey Bay for desalination, Cal Am's test slant well draws water from two aquifers. The upper intake is drawing fresh water from the shallow Dune Sand Aquifer (DSA) and the lower intake is drawing brackish water from the 180-foot aquifer. The total water drawn is around 46% DSA fresh water and 54% brackish water from the 180-foot aquifer. These are estimated slant well intake screen volumes. Note that the quality of the DSA water has been confirmed to be fresh water by Stanford University, using a proven high tech airborne electromagnetic measurement system.

The test slant well uses an electrical conductivity sensor to determine the total dissolved solids (mostly salt) in the drawn water. This sensor is located near the top of the 180-foot aquifer intake; but it is below the DSA (fresh water) intake. With the sensor in this location it primarily measures the electrical conductivity of the brackish 180-foot aquifer water; it does not measure the mixture of brackish and fresh DSA fresh water. The sensor should have been placed at the top of the test slant well to accurately measure the actual fresh water content of the mixed intake water.

A prominent California water law attorney has pointed out that the Monterey County Water Resources Agency Act prohibits exporting groundwater from the Salinas Valley Groundwater Basin. Cal Am is suggesting that the water being drawn from the 180-foot Aquifer is 93% seawater and only 7% fresh water. These measurements are made by the misplaced conductivity sensor. Cal Am proposes to pump 17,300 acre-feet from the Basin and return 7% fresh water by selling the 7% as desalinated water to the town of Castroville at a deeply discounted price. There is no provision in the Agency Act for taking and returning water to the Basin. This expert water law attorney believes that Cal Am's return water concept is rational for illegally pumping fresh water out of the Salinas Valley Groundwater Basin without water rights.

When DSA fresh water is mixed with the 180-foot aquifer intake the fresh water content might be as high as 52%. Consequently, the amount of desalinated water that will be produced and would need to be returned to Salinas Valley Groundwater Basin in Castroville is unknown but will unquestionably much higher than 7%.

Confirmation of the incorrect placement of the conductivity sensor in the test slant well can be viewed on page 32 of the Cal Am Test Slant Well Report 168 (See Reverse Side). The graph on this page indicates a decrease in the electrical conductivity in the water drawn by the test slant well starting in March of 2018. The decrease is due to the test slant well operating times being reduced from 24 hours per day to 6 hours per week. This dramatically reduced the amount of DSA fresh water drawn by the test slant well shallow intake. This allows the DSA fresh water to percolate down to the 180-foot aquifer sensor during the quiescent periods. This additional DSA fresh water reduced the volume of total dissolved solids in the water measured by the sensor by approximately 30%. The water measurement sensor indicated a fresh water increased from approximately 3% to about 23% in19 months. This fresh water also helps slow seawater intrusion.

Did Cal Am intend to misrepresent the total dissolved solids measurements of the blended brackish and fresh water by placing the sensor half way down the Test Slant Well? When there are 6 slant wells simultaneously drawing DSA fresh water how much water will need to be returned to the Basin? Is Cal Am's ultimate goal to create100% seawater intrusion in the Salinas Valley Groundwater Basin?

Charles Cech
Computer Automation Technologist, Monterey CA
chuck_cech@hotmail.com Cell Phone (831) 594-6117

CALIFORNIA AMERICAN WATER

Monterey Peninsula Water Supply Project
Test Slant Well Long Term Pumping Test
Monitoring Report No. 166

Specific Conductivity in MPWSP Test Slant Well

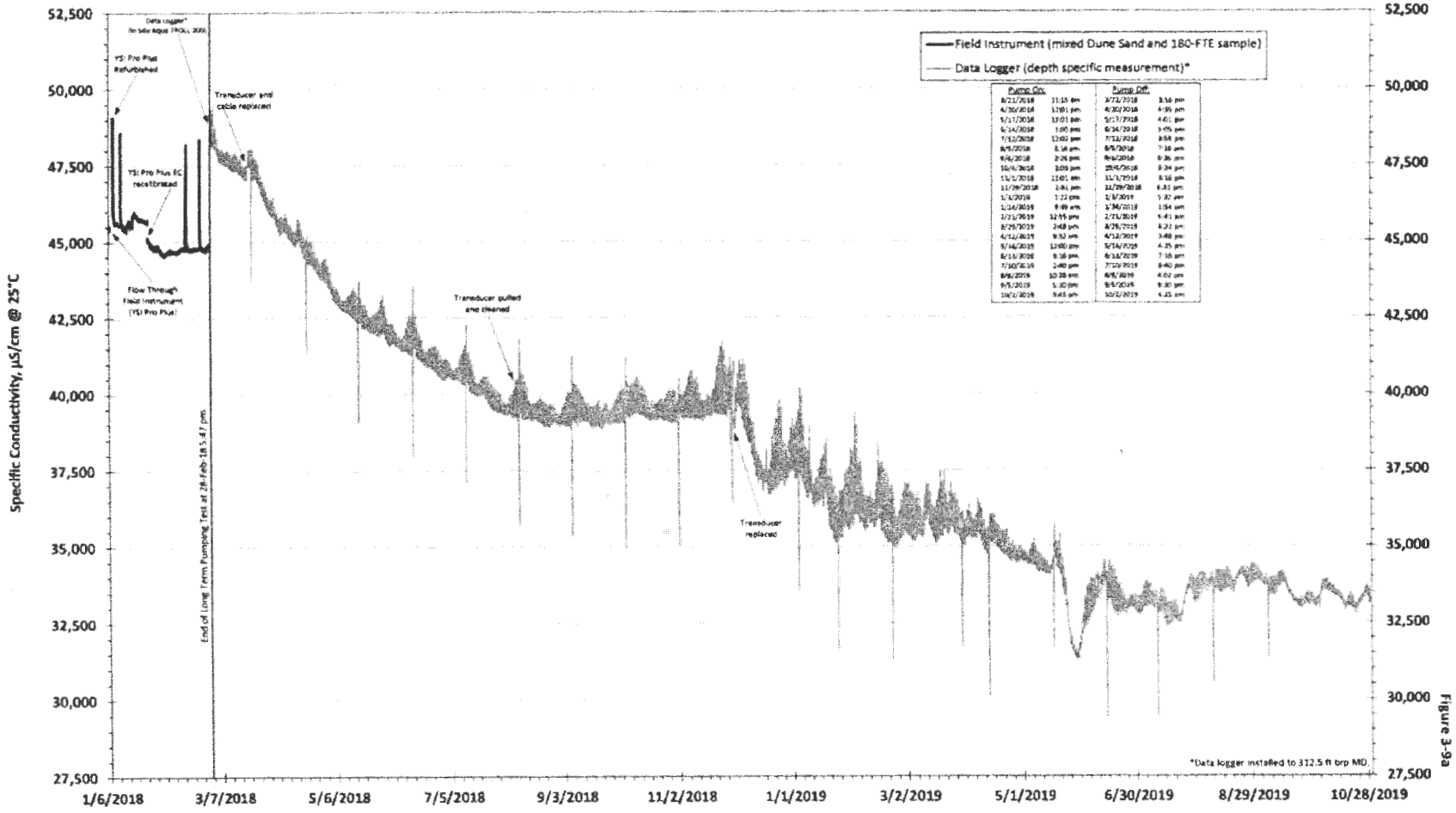


Figure 3-6a

5-Nov-19

GEOSCIENCE Support Services, Inc.

Specific Conductivity in MPWSP Test Slant Well

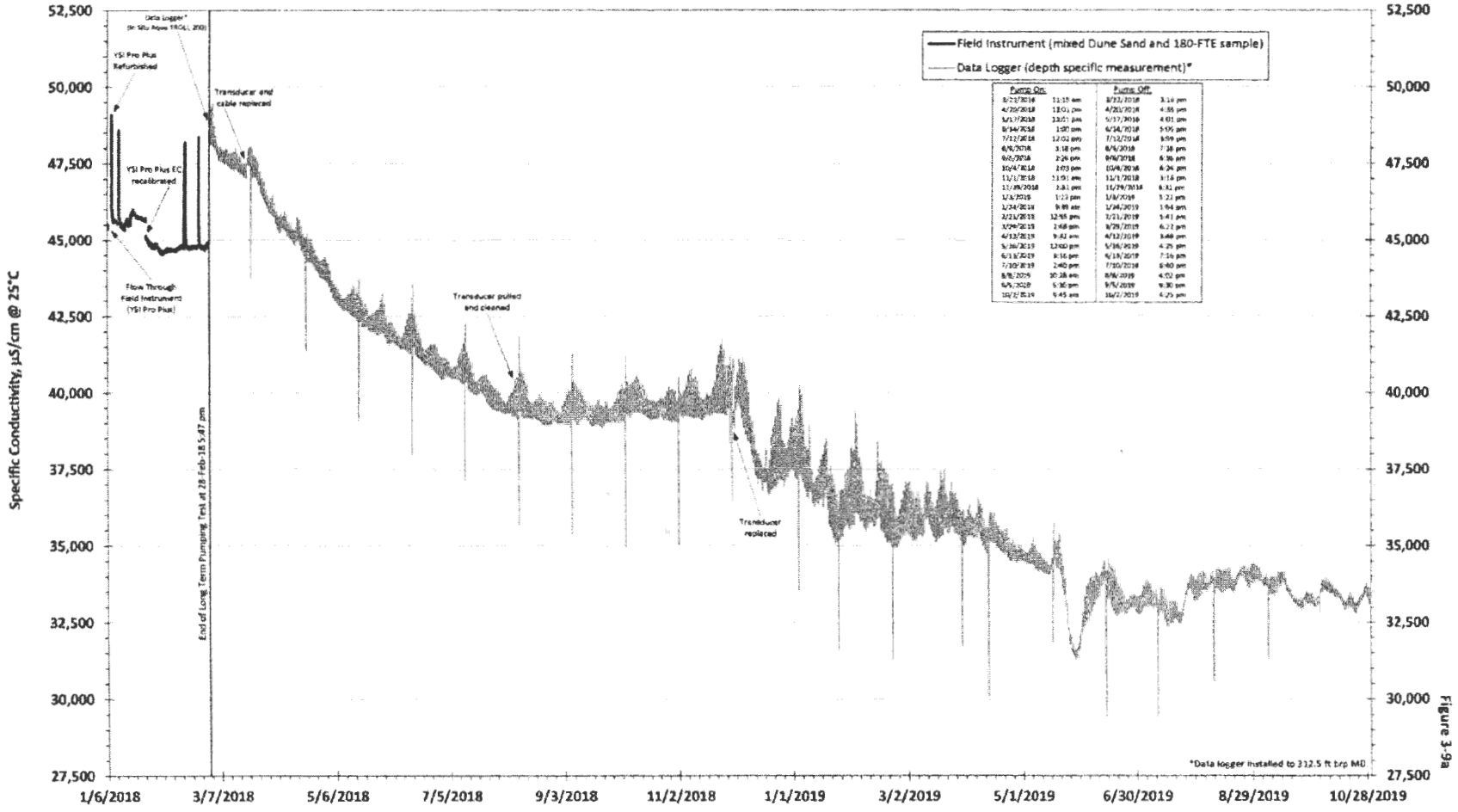


Figure 3-9a

Luster, Tom@Coastal

From: Robin R <robinarosintino@gmail.com>
Sent: Thursday, September 03, 2020 4:24 PM
To: CalAmMonterey@coastal; Robin Rosinski
Subject: Appeal No. A-3 MRA-19-0034; Deny CalAm Desalination Project Permit
Attachments: Birding 2.jpg; Birding 1.jpg

I am a resident of Marina California.I am highly opposed to the Cal AM Desal Project.
I feel very fortunate to live in a very beautiful and diverse area. I live a short distance to the dunes, beach and ocean which I frequent on a daily basis. Being a nature lover, it is important to me that our coast and its inhabitants, humans and all other creatures are treated with fairness and respect. I enjoy walking the beach and birdwatching. I enjoy the calmness I get while strolling along with the vast ocean on one side and the stunning dunes on the other. I also enjoy seeing many families playing with their children along the beach. Getting to experience these things on a regular basis makes my heart happy.
The Dunes are very important to me. I participate in a state parks program that is helping to restore dunes by removing invasive non native plants.The Marina community is also very important to me. I volunteer with organizations that feed the homeless and protect the ocean and educate school children.
Marina has borne the brunt of a landfill and sewage plant. The residents of this wonderful community are now being forced to have one more unsightly and a most environmentally unfriendly project and industrial buildings on their beautiful dunes. This is just not fair
1. This project is too expensive
2. The technology is unproven
3. The plant most likely will endanger our groundwater
4. There already is a much more environmentally friendly and affordable alternative, Monterey One Water.

I urge you to side with the residents of Marina and the Staff at the California Coastal Commision and Deny the Permit for the Cal AM Project.
Robin Rosinski Resident of Marina California
--
Kind Wishes
Robin Rosinski

Luster, Tom@Coastal

From: Merry Nolte <merrynolte@gmail.com>
Sent: Thursday, September 03, 2020 3:20 PM
To: CalAmMonterey@coastal
Subject: September 17 Hearing

I oppose granting any permit for Cal Am to build a desalination plant. It is unnecessary at this time, as the Pure Water Now project provides sufficient water, thanks to local support for water conservation. Eventually, a desal plant may be needed, but let's wait for improved technology and reduced costs. Monterey Peninsula does not need to be the first to test, and finance, a new system.

Also, this proposed plant would probably damage the city of Marina's water supply. Marina (where I do not live) has long been the neglected stepchild of the Monterey Peninsula, with its sand mining, county dump, etc. It does not seem fair that more infrastructure should be built there, which would not even benefit Marina residents.

Thank you for your consideration.

Merry Nolte
Carmel Valley

Luster, Tom@Coastal

From: Mark Angel <markcangel@att.net>
Sent: Thursday, September 03, 2020 1:27 PM
To: CalAmMonterey@coastal
Subject: No Desal: Yes Pure Water

For the following reasons I support the Coastal Commission recommendations:

– Cal Am's Desal project is not in the public interest
– Pure Water Monterey Expansion is the feasible and environmentally preferable alternative
– It will give us a new water supply much sooner than desal
– Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021. The environmental issues facing the Carmel River have been resolved without Cal Am's desal.
– There is no water supply crisis
– There will not be Truly Affordable Housing without affordable water. Cal Am's desal would double our water bills.

– We don't need Cal Am's oversized, over priced desal project to provide our future water supply.
– Expansion of Pure Water Monterey provides a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and protecting the Carmel River and the Seaside basin.
– Cal Am is the only obstacle to the expansion of Pure Water Monterey.
– Cal Am cannot be trusted. Passing Measure J was the community's statement

– Desal damages the environment, costs too much and creates environmental injustice.
– Desal harms the coastal habitat and Marina's beautiful dunes and their endangered species.

– Desal has no legal source water, it would draw groundwater from an overdrafted groundwater basin -- NOT under the ocean
– PWM Expansion source water is primarily the 8,000 acre-feet of excess wastewater that is now discharged into the Bay. It is contractually secure and drought proof
– Orange County has used this same system for decades
– Cal Am has had 25 years to solve or water supply problem and not done so
– Our public agencies have solved it in the last 6 years. Now all the water we need for decades is available, but Cal Am is blocking it.

Thank you,

Mark Angel
77 Middle Canyon Road
Carmel Valley, CA 93924

Luster, Tom@Coastal

From: Jeanne Turner <jturner215@comcast.net>
Sent: Thursday, September 03, 2020 12:41 PM
To: CalAmMonterey@coastal
Subject: Vote Against Cal Am's desal project!

Dear Commissioners,

Your staff did its homework! There is no water crisis on the Monterey Peninsula. Pure Water Monterey's recycled water is the sustainable source of water we need to supply the Monterey Peninsula for decades to come. Phase 1 water has already been injected into the Seaside aquifer. That will be enough to meet the December 2021 deadline for illegal withdrawals of water from the Carmel River.

The truth is that Cal Am's desalination project is the only option on which they can make a huge profit. It is not in the best interests of our water customers, as it would double the price of our water which is already the most expensive in the country (according to Food and Water Watch). Pure Water Monterey has the capability to expand and meet the water needs of those of us being served by the Monterey Peninsula Water Management District. An expansion of the project would provide a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and restoration of the Carmel River and the Seaside basin. Cal Am is the only thing standing in the way of this expansion.

Please vote against the Cal Am desal project.

Sincerely,

Jeanne Turner

Luster, Tom@Coastal

From: Suzanne Roland <suzanne_roland@yahoo.com>
Sent: Thursday, September 03, 2020 12:12 PM
To: CalAmMonterey@coastal
Subject: CalAm's Desal Project

Cal Am's Desal project is not in the public interest

– Pure Water Monterey Expansion is the feasible and environmentally preferable alternative
– It will give us a new water supply much sooner than desal
– Our new water supply from Pure Water Monterey – Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021. The environmental issues facing the Carmel River have been resolved without Cal Am's desal.
– There is no water supply crisis; new water from recycling is able to meet our needs right now.
– No Affordable housing without affordable water. Cal Am's desal would double our water bills.
– We don't need Cal Am's oversized, over-priced desal project to provide our future water supply;
– Expansion of Pure Water Monterey provides a long-term sustainable water source that is capable of supporting affordable housing, economic recovery and protecting the Carmel River and the Seaside basin.
– Cal Am is the only obstacle to the expansion of Pure Water Monterey.
– Cal Am cannot be trusted. Passing Measure J was the community's statement that we should run our own system;
– Desal damages the environment, costs too much and creates environmental injustice relative to Marina's impact;
– Desal harms the coastal habitat and Marina's beautiful dunes
– Desal has no legal source water, it would draw groundwater from an overdrafted groundwater basin NOT under the ocean
– PWM Expansion source water is primarily the 8,000 acre-feet of excess wastewater that is now discharged into the Bay. It is contractually secure and drought proof;
– Cal Am has had 25 years to solve or water supply problem
– Our public agencies have solved it in the last 6 years. Now all the water we need for decades is available, but Cal Am is blocking it

M.Suzanne Roland
179 Palm Avenue
Marina, CA 93933
(831)582-9646
E-Mail: suzanne_roland@yahoo.com

Luster, Tom@Coastal

From: Nancy Runyon <nancy@nancyrunyon.com>
Sent: Thursday, September 03, 2020 11:59 AM
To: CalAmMonterey@coastal; Luster, Tom@Coastal; Carl, Dan@Coastal; Craig, Susan@Coastal
Subject: Comment for CCC Special Meeting September 17, 2020 Th 3a & 4a, Appeal No. A-3-MRA-19-0034 (California American Water) and Appl. No. 9-19-0198
Attachments: CaCoastalCom ltr deny Cal Am 9.17.20.docx

Dear California Coastal Commission,
Please distribute my attached comment to all Commissioners for this extremely important issue.
I thank you for your very thorough staff report and strongly concur with your request for denial.

Nancy Runyon
nancyrunyon.com
1195 Hoffman Avenue
Monterey, CA 93940
(831) 649-8132 home/office
email: nancy@nancyrunyon.com

Nancy Runyon
1195 Hoffman Avenue
Monterey, CA 93940

September 3, 2020

California Coastal Commission
Email to CalAmMonterey@coastal.ca.gov
Subject: Special Meeting September 17, 2020 **Th3a & 4a**
Appeal No. A-3-MRA-19-0034 (California American Water) and Appl. No. 9-19-0198

Chair Padilla, Commissioners and Staff,

I strongly **support your staff's recommendation** for denial of California American Water's (Cal-Am) appeal of the City of Marina's decision and your staff's recommendation for denial of Cal-Am's Application to build more pipelines we do not need. Your staff's and expert consultants very thorough evaluation of the environmental and economic damage and environmental justice issues that the Cal-Am proposed desalination plant in Marina will cause is so appreciated by every Cal-Am ratepayer I know.

Why Cal-Am could not find or create an affordable water source in the last 25 years since the CDO was issued, I can only assume is because they are incompetent and/or only driven by how they can maximize their profit. Cal-Am chooses to waste our money on glossy brochures filled with lies and scare tactics rather than provide water we can afford. It's no wonder we do not trust them. We are tired of paying for their mismanagement and mistakes.

Over 35,000 Monterey Peninsula ratepayers voted successfully to pursue a public takeover of Cal-Am in 2018. The Monterey Peninsula Water Management District's (MPWMD) feasibility study then showed that publically owned water (as over 85% of our country has already) with the recycled water project MPWMD developed (not Cal-Am), Pure Water Monterey, will save us huge amounts of money without the environmental damage that would be caused by the proposed Cal-Am Desal project. Pure Water Monterey will provide water for growth and affordable housing. Cal-Am's desal water will be too expensive for the affordable housing projects they are now sending us large postcards claiming only their desal project can provide. They can only lie and send out misleading propaganda because the facts do not support their claims.

Castroville is an under-privileged community that also needs water, but Cal-Am's desal project is not answer. I thank your staff for recognizing that I am one of the many poverty level senior citizens of the Monterey Peninsula, still working to pay bills. I think we all deserve the economic benefits of publically owned water. Cal-Am's expensive water is just not sustainable for anyone.

We, who live on the Monterey Peninsula, who have been the very best at water conservation in the state, **do not want to steal water from Marina**. We **do not want to cause environmental damage** to our coastal habitats. We do not want to cause salt intrusion into aquifers and potentially destroy the Salinas Valley agriculture. And we have learned from experience to have **no faith or trust in Cal-Am's management**. The less water we used, the more Cal-Am charged us to protect their profits. The CPUC has finally recognized that Cal-Am's WRAM has not been fair to ratepayers (8/27/2020 vote to discontinue).

The **Pure Water Monterey project will supply all the water we need** and provide for growth for more than 40 years. This new water supply Phase 1 (3,500 acre-feet) will allow us to restore the Carmel River and stop illegal withdrawals by December 2021, much earlier than the Cal-Am desal ever would, if it can be built at all with its pending lawsuits. We will still conserve water as it has become our lifestyle. In the future, if we

need to develop a desal plant we can choose a better location and technology that will not cause damage to the environment or bankrupt us all.

The Cal-Am Desal Plant proposed would produce more water than the Monterey Peninsula will need for decades. With our **current water being the most expensive in the country,** we can't afford to pay for water we aren't using. And we certainly **can't afford to pay the expected 2-3 times** what we are paying now for the Cal-Am Desal project nor Cal-Am legal bills to fight the City of Marina. Cal-Am's desal project and history of mismanagement is just too expensive for us in every way: economically, environmentally, ethically...

I thank your staff for their thorough report and urge you to **stop the wasting of our money and deny** the Cal-Am Appeal and Application for building pipeline for a desal plant we do not need or want.

Thank you,

Nancy Runyon

Cal-Am ratepayer since 1998

Luster, Tom@Coastal

From: fglt@sprynet.com
Sent: Thursday, September 03, 2020 11:02 AM
To: CalAmMonterey@coastal
Subject: Submittal of Letter re:Cal Am's Application for a Coastal Development Permit
Attachments: 2020 Letter to Coastal Commission.pdf

Attached is a letter outlining my rationale on why Cal Am's Application for a Coastal Development Permit should be denied.

Forrest Gunnison

Carmel CA

September 3, 2020

California Coastal Commission
Chair Dana Bochco, Commissioners and staff

Re: Denial of California American Water's Application for a Coastal Development Permit

Please deny California American Water's application for a Coastal Development Permit as not being in the public interest for at least the following reasons: a) the water production projections for California American's desalination plant ("the desalination plant") are outdated and far exceed the projected water demand over the life of the desalination plant; b) there is an environmentally superior alternative available; and c) there is a lower cost alternative available. The Coastal Commission staff correctly analyzes these issues in their latest report, and I urge you to adopt its findings.

Since the staff's original report, nothing has changed except California American Water's (Cal Am's) attempts to scare the populace into supporting the misguided, expensive, and unneeded desalination plant. The Pure Water Monterey Expansion Project ("PWME Project") meets the projected water demands for the Monterey Peninsula, while mitigating the effects on the environment and costing less than the desalination plant.

In addition, the Pure Water Monterey – Phase 1 (3,500 acre-feet) allows restoration of the Carmel River and allows stopping illegal withdrawals by December 2021. The environmental issues facing the Carmel River are resolved without Cal Am's desalination plant.

There is no water supply crisis. Cal Am's arguments to the contrary demonstrates that Cal Am cannot be trusted.

Unfortunately, Cal Am's interest appears to be directed more to providing profits for it shareholders than to providing the most environment friendly, lowest cost water to its customers. Cal Am appears to be the only obstacle to expansion of Pure Water Monterey, which, compared to the desalination plant, will provide the most environment friendly, lowest cost water to customers.

The PWME Project is projected to produce less greenhouse gases than the desalination plant. The desalination plant would produce 250 times more greenhouse gas than the PWME Project, and so the desalination plant is not in the public interest.

The desalination plant is estimated to cost Monterey Peninsula ratepayers $1.2 billion compared to $190 million for the environmentally superior alternative, the PWME Project. The excessive costs for unneeded water generation capacity will saddle the Monterey Peninsula with yet another handicap in maintaining and further developing an economically diverse population. Cal Am argues that affordable housing and economic recovery is not feasible without the desal plant. This totally ignores that costs associated with the desal plant and its costly water will take money away from everyone that could be used for other purposes such as sustaining the economy and affordable housing. The negative effects of unnecessarily costly water can be mitigated by denying California American Water's application for a Coastal Development Permit so that the lower cost alternative can be pursued.

Clearly, the desalination plant is not in our community's interest. It benefits Cal Am shareholders, while creating environmental damage and unnecessary financial burden for the Monterey Peninsula. I ask you to deny this permit.

Forrest Gunnison
Carmel, CA

Luster, Tom@Coastal

From: Juul Vanderspek <juulvanderspek@yahoo.com>
Sent: Wednesday, September 02, 2020 11:47 PM
To: CalAmMonterey@coastal
Subject: Fw: Appeal No. A-3-MRA-19-0034; Deny CalAm Desalination Project Permit.
Attachments: image1.jpeg

Dear CA Coastal Commissioners, Executive Director John Ainsworth and staff,

My name is Julius VanderSpek, resident of Marina.

Like many other inhabitants of my town I am protesting against the proposed CalAm desalination project.
As detailed in your staff report, this project is in effect raiding the Marina aquifer, and it amazes me to no end that the working class population of Marina had to spend their time, energy and money for over four years now to rally against this harmful project. That is, defending Marina's critical resources to which CalAm has no rights whatsoever.
The water purification project is a better solution to the region's water supply.

Please deny this water theft,

Thank you,

Julius VanderSpek

Luster, Tom@Coastal

From: Vicki Williams <vickimwilliams@gmail.com>
Sent: Wednesday, September 02, 2020 10:07 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

Dear Commissioners,

I am writing to say that I wholeheartedly support the California Coastal Commission Staff recommendation to deny the Cal Am Water proposed desalination project.

I have lived on the Monterey Peninsula since 1969 and have lived through all on going water challenges. Pure Water Monterey is giving us the solution that has been needed since 1995. It is feasible, a less damaging alternative that will adequately provide water; protect public welfare, the environment and the best economic solutions for the ratepayers.

Other key issues that are important to this community is, affordability and environment. Affordability is key to our economically diverse community that is badly in need of affordable housing, which cannot happen without affordable water. The Pure Water Monterey allows that to happen.

Desal damages the environment, is costly and harms the coastal habitat and the City of Marina's beautiful dunes.

I am grateful to our public agencies that have developed a solution to our water needs in just six years.

Sincerely,

Vicki Williams
650 Martin St
Monterey, CA 93940

Luster, Tom@Coastal

From: Tim Smith <tswheelwright@gmail.com>
Sent: Wednesday, September 02, 2020 7:56 PM
To: CalAmMonterey@coastal
Subject: Cal-Am Desal Project

Dear commission member,

As a resident of Carmel Valley on the Monterey Peninsula where Cal-Am is seeking to saddle us with yet another unaffordable, yet for them highly profitable project, I am writing you to urge a no vote on Cal-Am's proposals.

First off, we as a community, have done what was required of us to not only save water, but to develop sources of water that have clearly obviated the need for deal water.

Secondly, we already have some of the highest rates in the nation for water, and they will only get higher as we are burdened with Cal-Am's profit oriented approach to a public resource. How this has anything to do with making anything more affordable is beyond me.

Our newly developed source from Pure Water Monterey allows us to meet state requirements for environmental protection of the precious Carmel River aquifer with no need for over-pumping, as Cal-Am has done for years, passing the problems along to us. We have met that challenge, and deserve to chose our own destiny when it comes to supply and demand issues in our community. Anything less is anti-democratic and flies in the face of the people's will as evidenced in the Prop J outcome.

For years Cal-Am has overdrawn not only our water but our reserves of trust in them as a reputable utility that has our best interests at heart. Its time to put an end to their profiteering. As they currently oppose a proven solution, one that the community as a whole supports, is measure enough of their intention and willingness to disregard what is right in favor of what brings them cash and us needed financial burden.

Please see that the Deal Project is rejected. Do the right thing for the people you serve, not the corporations who come before you seeking to further gouge, lie, and deny.

Thank you.

Timothy Smith
101 Calle de Quien Sabe
Carmel Valley, CA 93924

Luster, Tom@Coastal

From:	mcopperma@aol.com
Sent:	Wednesday, September 02, 2020 6:51 PM
To:	CalAmMonterey@coastal; CalAmMonterey@coastal; j@aol.com; Ainsworth, John@Coastal; Luster, Tom@Coastal; Luster, Tom@Coastal
Subject:	September 17, 2020 Coastal Commission Meeting/hearing re CalAm Coastal Development Permit Application and Appeal
Attachments:	Coppernoll Final Response #2 to CCC Staff Report Recommendation to Deny CalAm Permit, 29 August 2020.docx

Dear Commissioners, Commissioner Alternates, John Ainsworth, Tom Luster and Staff,

Please accept the attached letter for your consideration and public comment input pertaining to the staff recommendation to deny the CalAm Coastal Development Permit Application and Appeal. It is my firm, and confirmed, conviction that the staff did a magnificent and absolutely thorough job in researching and presenting its findings and Conclusions. They "Got it Right" again, and have conscientiously put forward the only valid recommendation based on the scientific research and evidence: permit denial. I submitted the attached letter earlier, but want to ensure all proper procedural guidelines are followed, thus I am re-sending for that purpose - it is too important to risk your not seeing my communication.

Even if this permit were to be approved, which I strongly hope does not happen, the CalAm desalination project would be doomed to future failure because ultimately this project will run up against the State of California Sustainable Groundwater Management Act (SGMA) of 2014. The Salinas Valley Groundwater Basin, which is already on the state's critically over drafted groundwater list, will be under SGMA management stipulations that CalAm is currently violating, and will even increase violations if six more slant wells are allowed to be installed in the City of Marina's Dune Sand Aquifers and the 180/400 Foot Aquifers, the sole source of potable water for Marina and the Ord Communities. SGMA is working to mitigate the existing seawater intrusion in these aquifers. CalAm's desalination project would seriously increase seawater intrusion, per an independent hydrogeologist's scientific analysis and evaluation of the HydroFocus report in the CalAm EIR, Appendix E-2, a report that Water Plus provided to you under separate communication.

If you should approve the permit, it would, in my opinion, necessarily be overturned because this desalination project would further damage the Salinas River and its aquifers. This decision would ultimately bring an abrupt end to the desalination project, thereby leaving the Monterey Peninsula stranded without a potable water supply, and a huge unaffordable cost. **There is NO ENVIRONMENTAL JUSTICE achieved by approving the CalAm desalination permit.** Only future disaster is assured for all our communities. Marina ends up with no water at all, its potable water supply being destroyed, and the CalAm desalination plant forced to close due to its destruction of the Salinas River aquifers, leaving the Monterey Peninsula without sufficient potable

water. CalAm has already demonstrated it willfully endangered the Carmel River to the point of being issued a Cease and Desist Order from the State Water Resources Control Board that oversees surface water, but has no jurisdiction over groundwater. CalAm also over pumped the Seaside Basin, bringing on litigation and the adjudication of the Seaside Basin, which left CalAm owing the Seaside Basin a water debt yet to be repaid.

Please, please, Commissioners, understand the significance of a vote to deny this CalAm permit. As stated above, your staff got it right again. Permit denial is the only right answer. You will be praised for looking beyond the CalAm campaign to obfuscate, confuse, manipulate, and deceive you in order to obtain what it wants - more and more profits for its shareholders. Please do not let this greed happen at the expense of good citizens who have conscientiously conserved water and struggled for years against CalAm's nefarious and injurious actions in order to obtain environmental justice. What CalAm failed to accomplish in 25 years, Monterey Peninsula public agencies have accomplished in 6 years! Give credit where credit is due.

The Pure Water Monterey Expansion is the right answer to provide all the potable water the Monterey Peninsula will need for decades to come. In the meantime, there will be new technologies to explore and more resources to procure and preserve that are just now being considered as possible water sources. Furthermore, the State of California has mandated that all possible water sources be used and recycled as a way to protect and preserve our precious reservoirs and aquifers as well as the Monterey Bay National Marine Sanctuary.

This fact makes the Pure Water Monterey Expansion even more supportable and of paramount importance to implement.

Thank you so very much for doing the right thing. I salute John Ainsworth, Tom Luster, and staff for their truly outstanding, admirable report. They deserve special commendation for their solid research and well presented scientific arguments and evidence. I am very proud of them and their achievements. When doing what is in the public interest as opposed to doing what is in the interest of corporate greed, there is reason to celebrate the good action. Please deny the permit.

Very respectfully,

Margaret-Anne Coppernoll, Ph.D.
Co-Founder, Citizens for Just Water
Marina

August 29, 2020

California Coastal Commission
Commissioners, Tom Luster and Staff

SUBJECT: September 17, 2020 California Coastal Commission Hearing for California American Water Company's Monterey Peninsula Water Supply Project (MPWSP) Consolidated Coastal Development Permit Application, No.9-19-0918 and Appeal No. A-3-MRA-19-0034

Dear Commissioners and Staff,

In my past two letters supporting a MPWSP California American Water Company (CalAm) consolidated coastal development permit application denial, and supporting the November 2019 Staff Report Recommendation to deny the project permit, I am writing a third time to re-emphasize the vital importance of endorsing the August 24, 2020 Staff Report that for a second time recommends permit denial. This report is so professionally presented, so thorough and well researched with substantive scientific evidence reinforcing every documented finding, that it should be impossible to espouse any decision other than permit and appeal denial.

The obvious negative impact this desalination project would have in our communities is undeniable, and confirmed by legal, environmental justice dictates, scientific data, and local coastal plans as well as the California Coastal Plan, that even the most uninformed person can understand these well thought out, well developed and logically presented, clearly sequenced arguments in favor of permit and appeal denial, that this letter may be rendered superfluous, so perfect and professionally accomplished is this staff report. It is an awesome, impeccable, exceptionally well researched document. Still I write again as a way to remind you just how seriously significant your decision is to the future of our communities and to our peace, financial well-being, and survival.

Please deny this permit and appeal. The staff expended an enormous amount of time and energy in its meticulous report preparation and execution. Tom Luster, a consummate environmental scientist, examined every point of analysis and provided every possible detailed explanation authenticating the reasons the permit and appeal must be denied. This project is infeasible and unsustainable. It will necessarily entail a future Cease and Desist Order from the State Water Resources Control Board to stop CalAm from over pumping and depleting, via seawater intrusion, the Salinas River Freshwater Dune Sands Aquifers from which the project fully and explicitly intends to extract its source water for its desalination plant. This intended action is in direct violation of the State of California Sustainable Groundwater Management Act of 2014 that mandates groundwater sustainability plans be developed and implemented to protect, restore, and preserve groundwater in the Salinas Valley Groundwater Basin, a basin that is already on the California critically over drafted groundwater basin list.

The Salinas River and its aquifers service Monterey county, having seven sub-basins that extend as far south as San Luis Obispo county. This water system interconnectedness makes permit denial even more crucial and consequential due to the dangerous seawater intrusion challenge and sea level rise projections resulting from climate change. It is noteworthy that the MPWSP slant wells have been proven, and designed, to cause seawater intrusion. Please refer to hydrogeologist Barbara Ford's independent analysis, paid for and distributed by Water Plus. The Ford report elucidates the true purpose behind CalAm's slant well design as described in the HydroFocus EIR report in Appendix E-2.

It is unconscionable that any agency is still even considering this project or contemplating whether or not it should be allowed to move forward. How can any agency even suggest that it might approve a project that is already pre-identified as being an illegal, infeasible, unsustainable project that will destroy the viability of the Salinas River and its essential-for-life aquifers that so many communities and endangered species and ESHA depend on for survival? We are dealing with a blatantly disingenuous and surreptitious company whose project disregards environmental justice, legal water rights, and the legitimate concerns of conscientious tax-paying citizens, their well-being, and their wishes!

There should be no discussion other than a motion to deny the permit and appeal. Any other decision is an aberration of decency and sound judgment. Please do the right thing and vote in the public's interest and against callous corporate greed.

Our citizens are exhausted from having to fight so strenuously, and for such an extended period of years, to obtain environmental justice, and to realize our human right to affordable potable water. Please deny the permit and support the Pure Water Monterey Expansion as the only sensible and acceptable alternative project.

Thank you so much for your efforts to complete a fair and thorough analysis of our water crisis. I urge you to vote in favor of the only viable, feasible, environmentally safe, water alternative solution, Pure Water Monterey Expansion, by upholding Staff's Findings, Conclusions, and Recommendation to deny the MPWSP consolidated coastal development permit application and appeal.

You will be blessed for doing what is best for our communities. We salute you for your wisdom and for being good stewards of the public trust.

Very respectfully,

s//Margaret-Anne Coppernoll//
Margaret-Anne Coppernoll, Ph.D.
Marina

Luster, Tom@Coastal

From: wallace notley <wwnotley@gmail.com>
Sent: Wednesday, September 02, 2020 5:15 PM
To: CalAmMonterey@coastal
Subject: Cal Am's Desal Project

Dear Commissioners and Staff

As your staff has so meticulously shown, there are key issues with Cal Am's desal including: 1. Cost of desal water is 2x-3x more than Pure Water Monterey Expansion recycled water (PWMX). The cost for ratepayers would be over $1 billion over 30 years. 2. Environmental issues including: a. destruction of 7 acres of coastal dunes on ESHA; b. hundreds of times more energy consumption; c. thousands of times more CO2 release; d. saltwater intrusion; f. does not provide drought reserve as does PWMX. g.discharges huge amounts of brine; h. PWMX has no legal issues and can meet the State Water Resources Control Board's Carmel River CDO in less time than desalination. One often overlooked issue though is our mistrust of Cal Am. They have consistently distorted facts so they can make ever more increasing profits; have consistently criticized and distorted scientifically based facts as in PWMX SEIR and mocked the November 2018 Measure J Campaign that was brought to voters by resident activists and was passed overwhelmingly by voters in November 2018 in the interest of the residents here; and now in the desal proposal before you are giving water to Castroville for $100 afy where we the Monterey Peninsula residents pay $6000-$8000 afy when CCC Staff shows Marina and Cal Am service area has 7x more residents that would be burdened than those in Castroville that would benefit. Also, not specifically mentioned in the CCC Staff report is that Marina and Cal Am's service area has more low income residents than Castroville.

PWMX came as the result of a cooperative creative problem solving effort from many government entities including Monterey One Water, Monterey Peninsula Water Management District, Federal Agencies, State Agencies, and local leaders to give the Monterey Peninsula a long-term sustainable solution to our water issues. Since Cal Am has been water purveyor in 1966 through the present, Cal Am has never adequately brought in all the local stakeholders for cooperative solutions because it is so focused on shareholder return. Cal Am never even bothered considering the harm it was doing to the Carmel River all those years and had to be issued a state mandate to quit overdrawing water. They only looked at the cheapest source for the most profit and greatest shareholder return. Cal Am has spent more on lobbying, distorting facts, and misrepresenting ratepayers than on any significant wise stewardship of our water resources. My ultimate wish for all of us negatively impacted here is that PWM and PWMX can restore the trust that Cal Am has broken and that we residents do everything we can to stop Cal Am from another failed and expensive project that we will pay dearly for. Please deny Cal Am's coastal permit.

Thank You for Your Consideration
Walt Notley
Carmel, Ca. 93923

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